

SHEARSON HAUGHTON vs JA-CO FOODS, INC.
Shearson Gabrielle Haughton Sims on 11/15/2021

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF MISSISSIPPI
2 ABERDEEN DIVISION

SHEARSON HAUGHTON PLAINTIFF

VS. CIVIL ACTION NO. 1:20-cv-241-SA-DAS

JA-CO FOODS, INC. d/b/a SONIC DRIVE-INS DEFENDANT

DEPOSITION OF SHEARSON GABRIELLE HAUGHTON SIMS

15 TAKEN AT THE INSTANCE OF THE DEFENDANT
AT THE MONROE COUNTY CIRCUIT COURT

AT THE MONROE COUNTY CIRCUIT COURT

301 SOUTH CHESTNUT STREET, ABERDEEN, MISSISSIPPI

ON NOVEMBER 15, 2021, BEGINNING AT 9:08 A.M.

EXHIBIT

GENA MATTISON GLENN, CSR 1568

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1	APPEARANCES:		1 SHEARSON GABRIELLE HAUGHTON SIMS,
2	THE STUTZMAN LAW FIRM		2 being first duly sworn, was examined
3	106 Luckney Station Road, Suite B		3 and testified under oath as follows:
4	Flowood, MS 39232		4
5	For the Plaintiff		5 EXAMINATION
6	BY: RONALD E. STUTZMAN		6 BY MS. TAYLOR:
7	BUTLER SNOW LLP		7 Q. Ms. Haughton, my name is Robin Taylor,
8	P.O. Box 6010		8 and we've just met right before the deposition;
9	Ridgeland, MS 39157-6010		9 is that correct?
10	For the Defendant		10 A. Yes, ma'am.
11	BY: ROBIN BANCK TAYLOR		11 Q. Okay. Can you please state your full
12			12 name for the record?
13			13 A. Shearson Gabrielle Haughton Sims.
14			14 Q. And do you go by Shearson?
15			15 A. Yes, ma'am, or Gabrielle.
16			16 Q. Say it again?
17			17 A. Shearson or Gabrielle.
18			18 Q. Okay. Gabrielle? And what is your
19			19 date of birth?
20			20 A. [REDACTED]
21			21 Q. Okay. And where are you from?
22			22 A. Aberdeen.
23			23 Q. Have you been born and raised here?
24			24 A. Yes, ma'am.
25	Reported by: GENA MATTISON GLENN, CSR 1568		25 Q. Okay. Is it okay if I call you
		Page 3	Page 5
1	TABLE OF CONTENTS		1 Shearston [sic]?
2	WITNESS	PAGE	2 A. Yes, ma'am.
3	SHEARSON GABRIELLE HAUGHTON SIMS		3 Q. Okay. So, Shearston, have you ever
4	Examination by Ms. Robin Banck Taylor	4	4 had your deposition taken before?
5			5 A. No, ma'am.
6	EXHIBIT	PAGE	6 Q. Okay. Have you ever testified in
7	NO. DESCRIPTION		7 court?
8	1 Plaintiff's Responses to Defendant's First		8 A. No, ma'am.
9	Set of Interrogatories and Requests for		9 Q. Okay. So what's going to happen today
10	Production of Documents	22	10 is -- obviously you've been sworn to tell the
11	2 Plaintiff's Supplemental and Restated		11 truth under penalty of perjury.
12	Responses to Defendant's First Set of		12 A. Uh-huh.
13	Interrogatories and Requests for		13 Q. I am going to ask you questions during
14	Production of Documents	33	14 the deposition. If you understand the question
15	3 11-1-13 Associate Discipline Record	72	15 I ask, you can answer it. If I ask a bad
16	4 1-12-14 Associate Discipline Record	74	16 question and you don't understand what I'm
17	5 1-30-14 Associate Discipline Record	78	17 asking, let me know. I'll try to rephrase it in
18	6 1-31-14 Associate Discipline Record	79	18 a way that you can understand it. Is that okay?
19	7 2-2-14 Associate Discipline Record	81	
20	8 2-17-14 Employee Statements	82	19 A. Okay.
21	9 New Hire Form	98	20 Q. Does that sound fair?
22	10 Employee Acknowledgement	98	21 A. Yes, ma'am.
23	11 Aberdeen PD Facts & Circumstances Form	145	22 Q. Okay. And you'll let me know if you
24	12 EEOC Charge of Discrimination	190	23 don't understand my question?
25	13 First Amended Complaint	192	24 A. Yes, ma'am.
	14 Bent	203	25 Q. Okay. Wonderful. Have you had any

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1	medication within the last week?	1	a single-family home or do you live in an
2	A. Allergy medicine for my allergies.	2	apartment? What is your --
3	Q. Okay. Do you have seasonal allergies?	3	A. It's an apartment house.
4	A. Yes, ma'am.	4	Q. Who lives with you there?
5	Q. What allergy medication have you had?	5	A. My husband and our four children.
6	A. A Benadryl.	6	Q. Okay. How long have you been married
7	Q. All right. You haven't had any	7	to your husband?
8	medication that would impact your ability to	8	A. 12 and a half years.
9	testify truthfully today; is that correct?	9	Q. And how old are your children?
10	A. Correct.	10	A. [REDACTED]
11	Q. Okay. Now, during the deposition --	11	Q. Let's start with the [REDACTED]
12	and I told Craig. I'm not sure if Ronnie and I	12	What is his name or is it a girl?
13	have had a conversation about it. I typically	13	A. [REDACTED]
14	take a while for a deposition. And so during	14	Q. Where does he go to school?
15	the day, if you need to take a break for any	15	A. He's homeschooled.
16	reason, just let me know.	16	Q. Homeschooled?
17	A. Okay.	17	A. All my children are homeschooled.
18	Q. It's not a marathon so, you know, just	18	Q. What grade is he in?
19	let me know. I'll ask that we kind of finish	19	A. He's in the 9th.
20	the line of questioning that we have and then we	20	Q. 9th grade. What curriculum do you use
21	can take a break. Okay?	21	to homeschool?
22	A. Okay.	22	A. Discovery K12, Khan Academy, and books
23	Q. Sometimes I can lose track of time and	23	and stuff I order for them.
24	I may continue on. I'd like for you to be able	24	Q. How long have you homeschooled
25	to take a break about every hour. So, you know,	25	children?
Page 7		Page 9	
1	if you feel like we've been at it for a while	1	A. For about five years, give or take.
2	and you want to breathe for a little bit and	2	Q. Okay. You've homeschooled all of your
3	step out, walk around, that's fine with me as	3	children for five years?
4	well. Okay?	4	A. Yes.
5	A. Okay.	5	Q. [REDACTED]
6	Q. All right. Can you think of any	6	[REDACTED]
7	reason why you could not testify truthfully	7	A. [REDACTED]
8	today?	8	Q. [REDACTED]
9	A. No, ma'am.	9	A. [REDACTED]
10	Q. Okay. And would you agree that you	10	Q. [REDACTED]
11	can recall events clearer or better closer in	11	A. She's in the 5th.
12	time to the event than you can, perhaps, several	12	Q. [REDACTED] or a
13	years later?	13	[REDACTED]
14	A. That's true.	14	A. [REDACTED]
15	Q. Okay. Where do you live now?	15	Q. [REDACTED] e?
16	A. Aberdeen. The street address?	16	A. [REDACTED]
17	Q. Yes, ma'am.	17	Q. And is she in school?
18	A. 862 Clay Street.	18	A. Yes.
19	Q. And how long have you lived there?	19	Q. Okay. [REDACTED]
20	A. For three years.	20	[REDACTED]
21	Q. Three years. And where did you live	21	A. He's not in school.
22	before that?	22	Q. Of course he's not. What's his name?
23	A. I lived at 303 South Meridian Street	23	A. Oh, I'm sorry.
24	before that?	24	Q. No, that's quite all right.
25	Q. Is your Clay Street -- do you live in	25	A. [REDACTED]

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<p>1 Q. You don't have any other children?</p> <p>2 A. No.</p> <p>3 Q. Okay. What is your husband's name?</p> <p>4 A. Curtis Sims, Sr.</p> <p>5 Q. Is he from Aberdeen as well?</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. Okay. What does he do for a living?</p> <p>8 A. He work at True Temper.</p> <p>9 Q. Where?</p> <p>10 A. True Temper.</p> <p>11 Q. What is that? What is that place?</p> <p>12 A. It's a company that make golf clubs and shafts.</p> <p>13 Q. Okay. Where is it located?</p> <p>14 A. In Amory.</p> <p>15 Q. How long has he worked for them?</p> <p>16 A. He's been there a year.</p> <p>17 Q. What does he do there?</p> <p>18 A. He run the things through the machine or something.</p> <p>19 Q. Okay. He's a machine operator?</p> <p>20 A. Yes.</p> <p>21 Q. And do you know how much -- is he paid hourly?</p> <p>22 A. 22.</p>	<p>Page 10</p> <p>1 Q. Okay. Okay. And tell me kind of what your typical day is with homeschooling your children.</p> <p>4 A. Normally we eat breakfast. And we do work, take a break, do more work. And we -- sometimes we play games with the work. And we read to each other.</p> <p>8 Q. Okay. And about what time does your day begin?</p> <p>10 A. We normally just start around 10:00 or 11:00.</p> <p>12 Q. Okay. And about what time do y'all finish schooling?</p> <p>14 A. It just varies.</p> <p>15 Q. What's your typical day that you end your schooling?</p> <p>17 A. Normally around 4:00 we be done.</p> <p>18 Q. Okay. Where did your husband work before he worked for the -- you said True Temper?</p> <p>21 A. He worked at a furniture factory in Wren, Lane Furniture.</p> <p>23 Q. I'm familiar with that. And how long did he work there?</p> <p>25 A. He was there over a year.</p>	<p>Page 12</p>
<p>1 Q. 20 --</p> <p>2 A. Plus production.</p> <p>3 Q. Okay. So that's \$22 an hour?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Does he usually work 40 hours a week?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And do you -- do you homeschool your four children yourself?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. So you would be considered their teacher?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And you've done that for five years?</p> <p>16 A. Yes.</p> <p>17 Q. Are your children involved in any extracurricular activities or sports?</p> <p>19 A. No.</p> <p>20 Q. I would think that homeschooling four children would be a full-time job.</p> <p>22 A. It's actually -- they enjoy it, you know.</p> <p>24 Q. Yeah.</p> <p>25 A. They enjoy -- they like to learn.</p>	<p>Page 11</p> <p>1 Q. And do you know why he left?</p> <p>2 A. COVID. He told them that he came in contact with -- he went to Food Giant, and they said to self-quarantine, so he did it. They fired him.</p> <p>6 Q. Okay. Where did he work before that?</p> <p>7 A. He was at NauticStar. Boats.</p> <p>8 Q. And how long did he work there?</p> <p>9 A. He worked there a long time. Years.</p> <p>10 Q. And why did he leave?</p> <p>11 A. Because I was having to go to the doctor and, well, take our children to the doctor and stuff, and he basically pointed out.</p> <p>14 Q. Okay. Okay.</p> <p>15 A. Because I don't drive.</p> <p>16 Q. Oh, you don't drive a vehicle?</p> <p>17 A. No, ma'am.</p> <p>18 Q. Have you ever driven?</p> <p>19 A. No, ma'am.</p> <p>20 Q. Okay. Is there a reason why you don't drive?</p> <p>22 A. I just don't drive. I don't -- it's not a reason. I just don't drive.</p> <p>24 Q. Just never learned?</p> <p>25 A. No.</p>	<p>Page 13</p>

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1 Q. Okay. Well, I was 17 before I got my 2 driver's license, so -- and I think if I could 3 find people to drive me places, I would do that 4 all the time. So I do understand. 5 Other than your four children and your 6 husband, does anyone else live with y'all? 7 A. No. That's all. 8 Q. During COVID did you receive any of 9 the COVID unemployment insurance or -- 10 A. My husband did. 11 Q. Husband did? 12 A. Uh-huh. 13 Q. About how much was that a week? 14 A. It was 600 a week. 15 Q. Okay. And about how long did he 16 receive that for? 17 A. I hate to guess because I really -- I 18 really can't remember. I don't know. I don't 19 know how long. I can't remember how long it 20 was. I know he started in April, I want to say. 21 And I think -- I don't know when it ended. 22 Q. Okay. And what are your household 23 bills in your home? 24 A. Car payment, house payment, light 25 bill, gas bill, and internet, phone bill.	1 Q. Okay. Is it over a hundred? 2 A. I really don't know because -- I don't 3 know. 4 Q. Okay. Do you typically pay the 5 household bills, or is that something your 6 husband does? 7 A. He does it. 8 Q. Okay. What about your internet? Do 9 you know how much that is? 10 A. I know it's over a hundred. 11 Q. Okay. And your phone? 12 A. Well, we have internet and phone, and 13 then we have our cell phones as well. 14 Q. Okay. You have a -- you have a 15 landline? 16 A. Yes. 17 Q. Okay. And what is your cell bill 18 typically a month? 19 A. Right at 40. Mine's right at 40. 20 Q. Okay. That's pretty fantastic for a 21 cell phone bill. It's ridiculous how much they 22 typically are. 23 Now, I understand that you had a child 24 that was born with a heart condition; is that 25 correct?
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1 Q. Is that pretty much it? 2 A. Yes. 3 Q. Okay. How much is your car payment? 4 A. It's 461 a month. 5 Q. Okay. That's for your husband's 6 vehicle? 7 A. It's ours but he drives. 8 Q. Okay. And what kind of vehicle is it? 9 A. It's a Acura MDX. 10 Q. What year? 11 A. I think it's a 2016. 12 Q. Okay. And about how much is your 13 house payment? 14 A. It's 462. 15 Q. Okay. What about your light bill? 16 A. It varies. 17 Q. What's about the highest it usually is 18 during the summer? 19 A. 200 -- a little over 200, I want to 20 say. 21 Q. Okay. What about your gas bill? 22 A. It varies. 23 Q. If you could give an average of what 24 it is? 25 A. I don't know.	1 A. Yes, ma'am. 2 Q. And which child is that? 3 A. My baby. 4 Q. It's your -- 5 A. 11-month-old. 6 Q. Okay. And how is he doing? 7 A. He's doing much better. 8 Q. Okay. And you had indicated that he 9 needed to have some type of a procedure done? 10 A. Yes. He had heart surgery February 11 the 15th. 12 Q. Of '21? 13 A. Yes, ma'am. 14 Q. Okay. And what was his heart 15 condition? 16 A. TAPVR. 17 Q. And what was the heart surgery he had? 18 A. They -- it's TAPV repair. That's all 19 I know. 20 Q. Okay. Has he continued to have 21 regular doctors' appointments related to the 22 heart surgery or heart condition? 23 A. Well, his last one was August. 24 Q. When is his next one scheduled? 25 A. February.

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<p style="text-align: right;">Page 18</p> <p>1 Q. Does he need any, like, maybe physical 2 therapy or some type of a regular care related 3 to his heart condition?</p> <p>4 A. Not anymore.</p> <p>5 Q. Okay. Do you anticipate that he will 6 be able to develop typically as a child would --</p> <p>7 A. Yes.</p> <p>8 Q. -- or will he need any further 9 treatment in the future?</p> <p>10 A. No. He won't need any further 11 treatment.</p> <p>12 Q. Okay. That's wonderful news.</p> <p>13 A. Uh-huh. A blessing.</p> <p>14 Q. Yeah. Do you -- do you attend church?</p> <p>15 A. We do church at home.</p> <p>16 Q. Okay. And what church do y'all do at 17 home?</p> <p>18 A. We worship the Sabbath.</p> <p>19 Q. Okay. And what do you mean by that, 20 Sabbath?</p> <p>21 A. On Saturday -- we have church on 22 Saturday. Like, normally people will have 23 church on Sunday?</p> <p>24 Q. Uh-huh.</p> <p>25 A. We have church on Saturday.</p>	<p style="text-align: right;">Page 20</p> <p>1 A. Fatima Haughton. Benjamin Haughton. 2 Stephanie Haughton. Dassana Haughton. I'm 3 sorry. That's Stephanie Haughton Griffin. It's 4 Griffin. She's married.</p> <p>5 Q. Okay.</p> <p>6 A. And then it's Darius Haughton. And 7 the last one is Aaliyah Haughton.</p> <p>8 Q. Do you have any -- are those all of 9 your siblings?</p> <p>10 A. On my mother's side.</p> <p>11 Q. Okay. And what about on your father's 12 side?</p> <p>13 A. Cora McPherson, Jhorace McPherson, and 14 Daisie McPherson.</p> <p>15 Q. Okay. What about aunts and uncles?</p> <p>16 A. I don't have any uncles on my -- on 17 either side that live here.</p> <p>18 Q. Okay. Where do they live?</p> <p>19 A. Four of them died. The other one live 20 in Virginia.</p> <p>21 Q. Okay. Okay. And are your parents 22 still alive?</p> <p>23 A. Yes.</p> <p>24 Q. What is your mother's name?</p> <p>25 A. Minerva Haughton.</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. Okay. And do you attend a church or 2 is it only church at home?</p> <p>3 A. Just church at home.</p> <p>4 Q. Okay. Is there a certain denomination 5 that you're affiliated with?</p> <p>6 A. Nondenominational [sic].</p> <p>7 Q. Nondenominational? I'm assuming, if 8 you are from Aberdeen, that you have a number of 9 relatives that live in the Aberdeen area?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And typically -- and I'll tell 12 you why we ask this. It's just when we go 13 through the process of selecting a jury --</p> <p>14 A. Uh-huh.</p> <p>15 Q. -- we'll want to know who your 16 relatives are so that we can understand if 17 you're related to any of the members of the jury 18 or the potential members of the jury. So if you 19 could just quickly kind of -- for both you and 20 your husband, just give me a brief synopsis of 21 what your family tree is of your living 22 relatives. We can start with your siblings.</p> <p>23 A. Oh, my -- you want to know their 24 names?</p> <p>25 Q. Yes, ma'am.</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. And what about your father?</p> <p>2 A. David McPherson.</p> <p>3 Q. And do they live in Aberdeen?</p> <p>4 A. I think my daddy still live in 5 Aberdeen.</p> <p>6 Q. Okay. Are you not close with your 7 dad?</p> <p>8 A. We are. It just I haven't seen him in 9 a while.</p> <p>10 Q. Okay. Does your mother live in 11 Aberdeen?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. What about your husband's 14 siblings?</p> <p>15 A. One of his brothers stay in Seattle. 16 And the other one, he's in Aberdeen. His name 17 Byron Sims.</p> <p>18 Q. Does he have any aunts and uncles?</p> <p>19 A. He has a great aunt, Emma Griffin. 20 His uncle, Andre Payne, he stays in Tupelo.</p> <p>21 Q. Are his parents still alive?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And what are their names?</p> <p>24 A. Debra Sims is his mother. And his 25 father is named Walter Curtis. He don't live</p>

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1 here. 2 Q. Okay. Where does he live? 3 A. Chicago. 4 Q. Okay. Okay. So what did you do to 5 prepare for your deposition? 6 A. What did I do to prepare? 7 Q. To prepare to be here today. 8 A. I went over notes. 9 Q. And what notes did you go over? 10 A. Notes that were sent to me. 11 MR. STUTZMAN: The discovery 12 responses. 13 MS. TAYLOR: I see. Okay. Okay. So 14 just to -- let me go ahead and mark this. 15 This is going to be challenging. 16 17 - - - - 18 (Exhibit Number 1 marked.) 19 BY MS. TAYLOR: 20 Q. Ms. Haughton, is this what you 21 reviewed? 22 A. Yes. 23 Q. Okay. Did you review anything else in 24 preparing for your deposition? 25 A. This is -- it's a pretty much all	1 Q. Yes, ma'am. 2 A. Yes, I did. 3 Q. Okay. Okay. And as you sit here 4 today, you believe that they're accurate? 5 A. As far as I -- the best of my ability, 6 you know, as accurate as I could remember. 7 Q. Okay. Okay. Now, where did -- where 8 have you gone to school as far as you know, did 9 you graduate from high school? 10 A. Yes. 11 Q. Okay. And where did you graduate 12 from? 13 A. Aberdeen High School. 14 Q. Okay. And when did you graduate? 15 A. 2007. 16 Q. Have you attended any technical 17 school, community college, or college after 18 graduating from high school? 19 A. Itawamba, but I didn't finish. 20 Q. Okay. How long did you attend? 21 A. It was only a few months. 22 Q. Okay. And that's a community college? 23 A. Yes. 24 Q. What were you studying? 25 A. Early childhood education.
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1 besides of a sheet that I was sent to -- you 2 know. 3 Q. Okay. Okay. And I don't want to know 4 what you -- like, if your attorney gave you a 5 certain sheet to give you instructions on 6 depositions or something along those lines, but 7 I would like to know the documents that you've 8 reviewed in order to prepare for your 9 deposition. So what is marked as Exhibit 1, 10 that's the document you reviewed? 11 A. It was only to try to memorize the 12 dates because -- 13 Q. Okay. Okay. Did you review any other 14 documents? 15 A. No. 16 Q. Okay. Did you have any conversations 17 with anyone other than your attorney in 18 preparing for your deposition today? 19 A. No. 20 Q. Okay. Now, before your responses to 21 interrogatories were -- and request for 22 production were sent to us, did you review these 23 to make sure that they were accurate? 24 A. I really just -- before they were sent 25 to you-all?	1 Q. And you said it was only for a couple 2 of months? 3 A. Yes. 4 Q. And why did you -- why did you leave? 5 A. Because I needed to focus more on my 6 son. 7 Q. How old were you when your son was 8 born? 9 A. I was 18. 10 Q. And I should have asked this earlier. 11 Is -- are all of your children -- is your 12 husband the father of all of your children? 13 A. Yes. 14 Q. Okay. And I assume that you have 15 never been married -- 16 A. No. 17 Q. -- before? 18 A. No. 19 Q. Has your husband ever been married 20 before? 21 A. No. 22 Q. Okay. Have you ever been arrested? 23 A. No. 24 Q. Other than the charges you filed 25 related to your employment at Sonic, have you

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1 ever filed any other criminal charges against 2 anyone before? 3 A. No. 4 Q. Have you ever called the police on 5 anyone before? 6 A. I'm pretty sure I have. I don't -- I 7 don't remember. I'm pretty sure I have. 8 Q. When do you think that you did that? 9 A. When it was shooting in my 10 neighborhood. 11 Q. When was that? 12 A. It was around the time of the 4th. 13 Q. Was it this year? 14 A. This year, last year, like, whenever 15 they shoot, you know -- 16 Q. Okay. So it typically is something 17 that happens every year? 18 A. Yes. 19 Q. Okay. 20 A. I don't call every year. 21 Q. Okay. How many times do you think 22 you've called? 23 A. Let me rephrase that. Let me -- the 24 times I'm home and they shoot around the 4th of 25 July, I have called. But I don't be at home	1 compensation claims? 2 A. No. Not that I can remember. 3 Q. What about -- have you ever filed for 4 unemployment? 5 A. I have filed for unemployment before. 6 Q. And when did you file for 7 unemployment? 8 A. I don't recall, but I know I have. 9 Q. Okay. You don't recall what job that 10 was? 11 A. I don't recall. I think it may have 12 been -- well, I don't recall. 13 Q. Okay. And what do you think it could 14 have possibly been? 15 A. It probably was -- like I say, I'm 16 just going to say I don't recall because I 17 really don't remember. 18 Q. Okay. Okay. And do you remember 19 about how long ago it was? 20 A. I don't. 21 Q. Okay. Have you ever testified in any 22 court? 23 A. No, ma'am. 24 Q. And you've never had your deposition 25 taken?
Page 27	Page 29
1 every year. 2 Q. Okay. Okay. Were you home this year 3 for July 4th? 4 A. Yes. 5 Q. Okay. 6 A. Oh, no, I -- for a little while, but I 7 left. It was -- it wasn't on the 4th. It was 8 around the time of the 4th when I called. 9 Q. Okay. And you called this year? 10 A. Yes. 11 Q. Okay. Have you ever called the police 12 for anything else? 13 A. Not that I can remember. 14 Q. Okay. Have the police ever been 15 called to your home? 16 A. To my home? No. 17 Q. Have you ever filed for bankruptcy? 18 A. No. 19 Q. Have you ever filed a lawsuit against 20 anybody? 21 A. No, ma'am. 22 Q. I mean, of course, other than the one 23 we're here about today. 24 A. No. This the only one. 25 Q. Okay. Have you ever filed any workers	1 A. No, ma'am. 2 Q. Have you ever filed an insurance claim 3 on your home or automobile? 4 A. No. 5 Q. Have you ever filed any other charges 6 of discrimination other than what was related to 7 your employment at Sonic? 8 A. No. Not that I can remember. I'm.... 9 Q. Have you ever settled a claim short of 10 filing a lawsuit, perhaps threatened to file a 11 lawsuit and then ended up resolving the claim? 12 A. No. 13 Q. Have you ever used illegal drugs? 14 A. No. 15 Q. Okay. So you said that you currently 16 live -- is that Clay Street? 17 A. Yes, ma'am. 18 Q. 862 Clay Street? 19 A. Yes. 20 Q. Okay. And you've lived there for, you 21 said, about three years? 22 A. Yes. 23 Q. And how long did you live at your 303 24 South Meridian Street location? 25 A. I think I lived there two years.

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<p>1 Q. Okay. And I see in your responses to 2 interrogatories, Number 12, you state that 3 before that you lived at 404 Evergreen Drive?</p> <p>4 A. Yes.</p> <p>5 Q. And how long did you live at 404 6 Evergreen Drive?</p> <p>7 A. A year, give or take.</p> <p>8 Q. Okay. And you also list that you 9 lived at 904 Watson Boulevard?</p> <p>10 A. Yes, I lived there in a house for a 11 while. I lived there for about a year, give or 12 take. I don't know.</p> <p>13 Q. And why did you move from the 404 14 Evergreen Drive location to the 303 South 15 Meridian Street location?</p> <p>16 A. Because it was sewage at the bottom of 17 the basement.</p> <p>18 Q. Okay. And what about the 303 South 19 Meridian Street address? Why did you move from 20 there to the 862 Clay Street?</p> <p>21 A. The water wasn't working right. We 22 had electrical issues.</p> <p>23 MR. STUTZMAN: Do you want to scoot 24 down a little bit so that sun's not in your 25 eyes? Does that help?</p>	<p>Page 30</p> <p>1 Q. Okay. And this might help because 2 this really is not a memory contest.</p> <p>3 A. Uh-huh.</p> <p>4 Q. So in preparing your responses to 5 interrogatories, one of the questions that we 6 asked you was for you to identify your prior 7 employers.</p> <p>8 A. Uh-huh.</p> <p>9 Q. And in identifying those prior 10 employers, how were you able to identify who you 11 had worked for previously?</p> <p>12 A. I know -- I know I worked for Wendy's.</p> <p>13 Q. Okay.</p> <p>14 A. I couldn't remember the exact time -- 15 you know, I gave my best, you know -- the time 16 that I could remember best, you know. It's not 17 accurate, you know.</p> <p>18 Q. Okay.</p> <p>19 A. It's not the exact, you know, time 20 frame. It was the best that I could remember 21 because it was so long ago.</p> <p>22 Q. I've got your employment -- let me --</p> <p>23 MR. STUTZMAN: We objected to 24 Interrogatory Number 11.</p> <p>25 MS. TAYLOR: Let's see. Sorry. It's</p>
<p>1 THE WITNESS: Yes.</p> <p>2 BY MS. TAYLOR:</p> <p>3 Q. Okay. Is that better? I feel like 4 the sun is still in your eyes.</p> <p>5 A. It's better.</p> <p>6 Q. Okay. I can scoot down if we need to 7 spread out a little bit more, so --</p> <p>8 A. I'm okay.</p> <p>9 Q. Okay. Okay. And are you having any 10 issues with your Clay Street --</p> <p>11 A. Not --</p> <p>12 Q. -- location?</p> <p>13 A. None at all.</p> <p>14 Q. Okay. Where have you worked during 15 your working life? Did you have a job while you 16 were in high school?</p> <p>17 A. Yes, I did.</p> <p>18 Q. Okay. And what job did you have 19 during high school?</p> <p>20 A. I worked at Wendy's.</p> <p>21 Q. Okay. And how long did you work at 22 Wendy's?</p> <p>23 A. It wasn't long at all.</p> <p>24 Q. How long was it?</p> <p>25 A. I don't know. A few months, maybe.</p>	<p>Page 31</p> <p>1 just taking me a little while to find....</p> <p>2 Let's go ahead and mark this as 3 Exhibit Number 2.</p> <p>4</p> <p>5 - - - - -</p> <p>6 (Exhibit Number 2 marked.)</p> <p>7 BY MS. TAYLOR:</p> <p>8 Q. Okay. So, Ms. Haughton, I have just 9 marked Exhibit Number 2, which are your 10 supplemental responses to interrogatories; and I 11 understand that initially you objected to 12 Interrogatory Number 11. And then after 13 discussion with your attorneys, you supplemented 14 that response to list your prior work history; 15 is that correct?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. I thought it might help 18 shortcut this and help you remember --</p> <p>19 A. Uh-huh.</p> <p>20 Q. -- as far as your prior work life. 21 If you go to your response or your 22 supplemental response to Interrogatory Number 23 11 -- I believe that's on page 15.</p> <p>24 A. I'm here.</p> <p>25 Q. Okay. Wonderful. Wonderful.</p>

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1 And you list here that you worked at 2 Wendy's from approximately August of 2006 to 3 October of 2006? 4 A. Yes. 5 Q. Is that right? 6 A. Yes. Around that time. 7 Q. Okay. So you worked there for about 8 two months? 9 A. Yes. It could have been a little 10 less, but I know it wasn't longer than October. 11 Q. Okay. Okay. 12 Let's do this. I wonder if you push 13 back your chair a little bit, you would not be 14 -- is that better? 15 A. Yes, ma'am. 16 Q. Okay. Okay. And you indicate that 17 you made approximately a dollar -- I mean \$6.25 18 per hour? 19 A. Yes. 20 Q. And do you remember any issues while 21 you worked at Wendy's? Did you get along well 22 with your supervisor? 23 A. Yes. 24 Q. Okay. Do you remember what your 25 supervisor's name was when you worked at	1 of birth? 2 A. [REDACTED]. 3 Q. Okay. And then the next employer you 4 list is at McDonald's in 2008. So that's about 5 two years after? 6 A. Uh-huh. 7 Q. What year did you graduate from high 8 school? 9 A. I graduated in May -- the year was 10 2007. 11 Q. Okay. And do you remember who your 12 supervisor was when you worked at McDonald's? 13 A. Nora. That was her name. 14 Q. And did you get along with Nora? 15 A. I did. 16 Q. And did you think that Nora was a fair 17 supervisor? 18 A. I do. 19 Q. And you indicate that you made \$6.25 20 per hour; is that correct? 21 A. I'm not a hundred percent sure, but 22 that's what I'm thinking. 23 Q. Okay. And why did you leave 24 McDonald's? 25 A. I had issues keeping a babysitter.
Page 35	Page 37
1 Wendy's? 2 A. I think the -- at that time I think 3 his name was Anthony. I'm not sure. 4 Q. And do you think that Anthony was a 5 fair supervisor? 6 A. Yes, I do. 7 Q. Was Anthony ever inappropriate with 8 you? 9 A. No. 10 Q. And why did you leave Wendy's? 11 A. I was pregnant, and my mama wanted me 12 to focus more on school. 13 Q. Okay. 14 A. I didn't know at that time, though. 15 Q. You were not aware you were pregnant? 16 A. Huh-uh. 17 Q. Okay. How far along were you when you 18 found out you were pregnant with your first 19 child? 20 A. I was, like -- I want to say almost 21 three months. 22 Q. Okay. Did you have your child before 23 or after you graduated? 24 A. Before I graduated. 25 Q. Okay. And what is your child's date	1 Q. Okay. Did you have any discipline or 2 any issues while you worked at McDonald's? 3 A. I had an issue with -- I never had, 4 like, a conflict; but it was a manager, 5 assistant manager or something, the things she 6 used to do, you know, how she act. 7 Q. And you -- 8 A. I never had any conflict with her. 9 Q. How did she act? 10 A. She was just rude to customers and 11 stuff. And, you know, if you're in a public 12 place, I just felt like that was not fair. 13 Q. Were you ever disciplined when you 14 worked at McDonald's? 15 A. No, ma'am. 16 Q. And are you eligible to be rehired at 17 McDonald's? 18 A. I'm not sure. As far as I know, yes. 19 Q. Okay. Do you remember the assistant 20 manager's name? 21 A. I don't. 22 Q. And you never had any conflict with 23 the assistant manager? 24 A. No. 25 Q. Okay. And the next employer you list

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<p>1 is Food Giant?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. And how long did you work at</p> <p>4 Food Giant?</p> <p>5 A. From -- let me see. It was -- I left</p> <p>6 in February. I started in August, and it was</p> <p>7 February.</p> <p>8 Q. Okay. So you worked there for about</p> <p>9 six months?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And you indicate that you</p> <p>12 worked at McDonald's for about -- I guess about</p> <p>13 two months or three months; is that right?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. You indicate that you made</p> <p>16 \$7.25 per hour?</p> <p>17 A. At Food Giant?</p> <p>18 Q. Yes, ma'am.</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And it looks like that you had</p> <p>21 a gap in employment from 2008 until 2013; is</p> <p>22 that right?</p> <p>23 A. Yes.</p> <p>24 Q. And why were you unemployed during</p> <p>25 that time?</p>	Page 38	<p>1 department was named Shirley.</p> <p>2 Q. Shirley. Okay. And did you get along</p> <p>3 with Shirley?</p> <p>4 A. Yes.</p> <p>5 Q. Do you remember what her last name is?</p> <p>6 A. I don't remember what her last name</p> <p>7 is.</p> <p>8 Q. Did you have any issues while you</p> <p>9 worked at Food Giant?</p> <p>10 A. I did have an issue with an employee.</p> <p>11 Q. And what issue did you have with an</p> <p>12 employee?</p> <p>13 A. She pushed me, and I told on her.</p> <p>14 Q. And why did she push you?</p> <p>15 A. I was the new girl, you know. And she</p> <p>16 felt like I was taking over, you know. Those</p> <p>17 was her words. She told me I can't come taking</p> <p>18 over, and I told her we could share the scene,</p> <p>19 you know. But she later apologized, and I even</p> <p>20 gave her a ride home.</p> <p>21 Q. Okay. And what was her name?</p> <p>22 A. Her name was Lorraine.</p> <p>23 Q. What was her last name?</p> <p>24 A. I think she was married to -- the guy</p> <p>25 she was married to was a Strong.</p>	Page 40
<p>1 A. Oh, I was going back and forth to the</p> <p>2 doctor with my son.</p> <p>3 Q. Okay.</p> <p>4 A. My oldest son.</p> <p>5 Q. Oh, okay. Was there -- did your</p> <p>6 oldest son have a health condition?</p> <p>7 A. He had GERD, real bad GERD.</p> <p>8 Q. Okay.</p> <p>9 A. And he's also lactose intolerant.</p> <p>10 Q. Pardon?</p> <p>11 A. He's also lactose intolerant.</p> <p>12 Q. Okay. And you said that your</p> <p>13 supervisor's name was Ms. Peggy?</p> <p>14 A. Yes.</p> <p>15 Q. At Food Giant?</p> <p>16 A. Yes.</p> <p>17 Q. Did you get along with Ms. Peggy?</p> <p>18 A. Yes.</p> <p>19 Q. Do you think Ms. Peggy was a fair</p> <p>20 supervisor?</p> <p>21 A. Yes.</p> <p>22 Q. Was she the manager of the Food Giant</p> <p>23 or was she the manager of your department?</p> <p>24 A. She was the manager of -- she was the</p> <p>25 supervisor of my department. The manager of my</p>	Page 39	<p>1 Q. Okay. When she pushed you did you</p> <p>2 push her back?</p> <p>3 A. No, ma'am.</p> <p>4 Q. Did you have any other issues when you</p> <p>5 worked at Food Giant?</p> <p>6 A. No, ma'am.</p> <p>7 Q. Were you ever disciplined while you</p> <p>8 worked at Food Giant?</p> <p>9 A. No.</p> <p>10 Q. And why did you leave Food Giant?</p> <p>11 A. I end up missing work. My son got</p> <p>12 sick. And I took him -- had to take him to the</p> <p>13 emergency room in Amory. And the manager -- the</p> <p>14 store manager, he was mad because I missed; and</p> <p>15 I told him that my son was sick. And he was</p> <p>16 like, Well, don't miss again. And I was like,</p> <p>17 I'm going to have to because he got to go to</p> <p>18 LeBonheur. So I just -- I -- I walked out. I</p> <p>19 left.</p> <p>20 Q. Okay. So you just left and quit?</p> <p>21 A. Yeah, because I knew my son had to go</p> <p>22 to the doctor, and I could not not take him.</p> <p>23 Q. Okay. How old was your son at that</p> <p>24 point?</p> <p>25 A. He was 9. 8 or 9.</p>	Page 41

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1 Q. And what was the manager who told you 2 you couldn't leave -- what was his name? 3 A. His name was Dwayne. 4 Q. And other than that did you get along 5 with Dwayne? 6 A. Yes. 7 Q. And did you think that he was a fair 8 supervisor? 9 A. Yes, besides me missing. I don't 10 think that was fair, you know. Besides me 11 missing to take my son to the doctor. 12 Q. Okay. Now, it looks like you -- so 13 from August 13 until you worked at Sonic in 14 2019, am I correct that you didn't have any 15 other employment? Well, it looks like you 16 worked at Superior Hair Products in August of 17 2019; is that correct? 18 A. Yes. I was working there -- in 2017 I 19 was writing books. I was self-employed in 2017. 20 Q. Okay. And how many books have you 21 written? 22 A. Eight. 23 Q. And have they been published? 24 A. Yes. 25 Q. How many have been published?	1 Q. And what is that about? 2 A. Both of them are erotica. 3 Q. What other books have you written? 4 A. I started off writing erotica. Then I 5 started writing Christian books. So it was -- 6 Bent was the third erotica book. And then it 7 was -- I started writing Christian books. The 8 Dreamer, God Is Real. Blessings and Lessons. 9 Q. What is that? Something and 10 blessings? What is it? 11 A. Blessings and Lessons. 12 Q. Okay. 13 A. And Secrets Within. My daughter has a 14 book, Snowy Day, that I helped her write. 15 Q. Any other books? 16 A. Huh-uh. I think that's all of them. 17 The Heart of Danny. 18 Q. The heart of what? 19 A. The Heart of Danny. 20 Q. Okay. So what -- the erotica books 21 that you wrote, what is the -- what is the book 22 Hooked about? 23 A. It's things that happen in everyday 24 life. You know, it's.... 25 Q. If you were to just briefly state what
Page 43	Page 45
1 A. All of them. 2 Q. Okay. Who was the publisher? 3 A. Amazon. 4 Q. Amazon published them? 5 A. Uh-huh. 6 Q. Okay. Did you work with a publishing 7 company to have them published? 8 A. No. 9 Q. Okay. Are they digital books or print 10 books? 11 A. Both. 12 Q. Okay. And Amazon printed them as 13 well? 14 A. Yes. 15 Q. Okay. And what are the names of the 16 books? 17 A. Hooked. 18 Q. And when was that book published? 19 A. I'm not sure. 20 Q. Would it be in the year 2017? 21 A. I'm not sure. I know Fundable Girls, 22 that's my very first book I wrote. And that one 23 was in 2017. 24 Q. Okay. And what is it called? 25 A. Fundable Girls.	1 the story line is? 2 A. It was a girl and her friend, and I 3 think her and her friend fell out, and she ended 4 up with a girl -- boyfriend. 5 Q. Ended up with a boyfriend? 6 A. Uh-huh. 7 Q. So it was a lesbian who ended up -- 8 A. Yes. 9 Q. -- with a boy? 10 A. Uh-huh. 11 Q. Okay. What about -- what about 12 Fundable Girls? 13 A. They are strippers who try and make 14 ends meet, and it was just really -- how can I 15 put this? She basically learned her lesson, in 16 the end, of, you know, messing around. The 17 story line is the reason why it's not good to -- 18 you know. 19 Q. You mean mess around like -- 20 A. Yes. 21 Q. -- being unfaithful? 22 A. Why you should not mess around. 23 Q. And what about Bent? 24 A. Bent is about a mother who basically 25 neglected her kids and -- and she end up leaving

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1 the guy in the end.	1 have listened.
2 Q. How did she leave him?	2 Q. Was your brother okay?
3 A. Ma'am?	3 A. Yeah. He was okay.
4 Q. How did she leave the guy in the end?	4 Q. Any other premonitions?
5 A. How did she leave him?	5 A. It's not really -- all of them is not
6 Q. Yeah.	6 premonitions. Some of them is, like, you know,
7 A. She was no longer with him.	7 this person, I touched her hand; and I got a bad
8 Q. Have you written any other erotica	8 feeling and I jerked my hand back away from her.
9 books?	9 I didn't know what that feeling was. She end up
10 A. No. I'm leaving out one. The Link	10 dying in a car accident.
11 Up. That's, like, a -- it's, like, a spinoff to	11 Q. And was it close in time to when you
12 the other ones, when all the characters come	12 touched her hand?
13 together.	13 A. No. It was, like -- I want to say a
14 Q. Would it be correct that your erotica	14 month afterwards.
15 novels are explicit --	15 Q. Have you had any other premonitions or
16 A. Yes.	16 feelings?
17 Q. -- when it comes to sex?	17 A. I've had them all my life.
18 A. It is.	18 Q. Have you had any other significant
19 Q. Okay. Now, your books that -- when	19 premonitions that were significant to you or
20 did you begin writing Christian novels?	20 perhaps foreshadowed something happening?
21 A. After the erotica. I left the erotica	21 A. To me?
22 alone and started writing Christian novels. I	22 Q. Uh-huh.
23 don't know the exact date that I started, but it	23 A. No. Not to me. I kept picturing my
24 was -- it wasn't in 2017. It was after 2017.	24 uncle. I didn't know why. Two days later he
25 Q. And what is the book <i>The Dreamer</i> , God	25 was in the hospital, and he end up dying.
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1 Is Real?	1 Q. Okay. When did he pass away?
2 A. It's based on a true story where this	2 A. April 4th.
3 girl named Sherry, she had, like, premonitions	3 Q. Of this year?
4 and stuff.	4 A. April 5th. Yeah. Easter. April 5th.
5 Q. And you said it's based on a true	5 Q. This year?
6 story?	6 A. Yes, ma'am.
7 A. Yes.	7 Q. Okay. I'm sorry for your loss.
8 Q. And who was Sherry? Do you know her?	8 A. It's okay.
9 A. I'm Sherry.	9 Q. What about your book <i>Blessings and</i>
10 Q. You're Sherry?	10 <i>Lessons</i> ? What was that book about?
11 A. Uh-huh.	11 A. That book is about the blessings
12 Q. Okay. And what premonitions did she	12 that'll come from doing good and the lessons
13 have or have you had?	13 that come from doing wrong.
14 A. I just -- I dream -- I see stuff	14 Q. And what about the book <i>Secrets</i>
15 before it happen.	15 Within?
16 Q. So in your book, what did -- what did	16 A. <i>Secrets Within</i> was about -- the
17 you write in your book as far as seeing stuff	17 character was being molested.
18 before it happens?	18 Q. How old was the character?
19 A. When I told my brother -- he went to a	19 A. I can't remember. I really can't
20 club, my younger brother. And I told him that I	20 remember how old she was. I can't remember.
21 didn't want him to go. But he went anyway, and	21 Q. Okay. Was she under the age of 18?
22 I had a bad feeling, like. So I called him and	22 A. Yes.
23 he didn't answer. And he told me, like, two,	23 Q. Okay. And what was the -- what
24 three minutes after you called, they were	24 happened in the book?
25 shooting at the club. And he was like, I should	25 A. Her cousin husband molested her and

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1 her brother friend molested her. Just really 2 just touched all over her and stuff. But she 3 didn't tell. 4 Q. And in what way was that a Christian 5 book? What was the Christian connection with 6 that book? 7 A. Oh, I'm sorry. I want to rephrase 8 that. That was -- it's not erotica, but it's 9 more of, like, an autobiography. 10 Q. Okay. And what about The Heart of 11 Danny? 12 A. It's a fantasy. It's, like, a love 13 story. It could be -- children could read it. 14 It's nothing bad at all. Well, teenagers. I'll 15 say teenagers could read it. It's nothing.... 16 Q. And what about your daughter's book, 17 Snowy Day? What is that about? 18 A. This young girl, she went to sleep -- 19 well, she wanted it to snow, and she was waiting 20 for it to snow. And it didn't know, and she -- 21 the whole time she thought it was snowing, it 22 really wasn't snowing. She was asleep, dreaming 23 it; and when she woke up, it actually started 24 snowing. 25 Q. Okay. Okay. And how much income have	1 of men with a broomstick; isn't that correct? 2 A. That's with Bent, yes. 3 Q. Okay. 4 A. Yes. Bent. When she left her 5 boyfriend. 6 Q. And she raped him with a broomstick; 7 is that correct? 8 A. Correct. 9 Q. And you also have rape of children in 10 that book; isn't that right? 11 A. It was her daughter. She was 18. 12 Q. And she was raped? 13 A. Yes. 14 Q. Okay. Now, I see that you also worked 15 for Superior Hair Growth Products. But it looks 16 like you worked there for a very short period of 17 time; is that right? 18 A. After the stuff happened at Sonic, I 19 didn't deal with my books. I -- I didn't deal 20 with my hair products or my books after that. 21 MR. STUTZMAN: Do you need to take a 22 break? 23 THE WITNESS: I'm okay. 24 MS. TAYLOR: So, Ms. Haughton, we've 25 been going for about an hour and 20
Page 51	Page 53
1 you received from your book sales? 2 A. I want to say -- let me see. I want 3 to say it was 150. 4 Q. And how many books have you sold? 5 A. I -- I really give my books away. I 6 don't deal with the erotica ones. But yeah. I 7 mainly give my books away. I.... 8 Q. You give your books away from Amazon? 9 A. Like -- it's not a lot of money in it. 10 Like, you'll get royalties. Your royalties 11 might be 10 cent, you know, for somebody turning 12 a page; or if someone order a book, you'll get 13 60 or 70%. They get they percentage, you know. 14 But it might equal up to \$2, you know. 15 Q. Okay. So in all you think that you've 16 made about \$150? 17 A. Yes. 18 Q. Now, in your erotica books -- and I 19 stated this earlier -- you have very explicit 20 sex scenes; isn't that right? 21 A. Yes, that's correct. 22 Q. And you have scenes that depict rape; 23 isn't that correct? 24 A. Yes. 25 Q. And you have scenes that depict rape	1 minutes. Let's take a five-minute break, 2 and then we can -- we can continue. Okay? 3 THE WITNESS: Okay. 4 (Brief recess.) 5 BY MS. TAYLOR: 6 Q. So, Ms. Haughton, when we broke we 7 were -- we had just finished talking about your 8 book-writing and the erotic novels, and then we 9 had begun talking about the Superior Hair Growth 10 Products piece. 11 And before we start, I should have 12 said this before we broke, but I would ask that 13 you not discuss your deposition testimony with 14 anyone during breaks. Okay? 15 A. Okay. 16 Q. Did you have any conversations with 17 anyone about your deposition testimony during 18 the break? 19 A. No. 20 Q. Okay. So when your attorney called 21 you outside into the hallway, y'all did not have 22 a conversation about your deposition testimony? 23 MR. STUTZMAN: I'm going to object to 24 this. We did not, but -- 25 MS. TAYLOR: Okay.

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1 BY MS. TAYLOR: 2 Q. Is that correct? 3 A. Yeah. 4 Q. Okay. Now, you worked for Superior 5 Hair Growth Products? 6 A. Yes, I did. 7 Q. Okay. And how long did you work for 8 them? 9 A. I started in August and I stopped in 10 January. 11 Q. Okay. And what did you do for them? 12 A. It was my own company that I had 13 started. 14 Q. And how did you start the company? 15 What was it based on? 16 A. It was hair growth products. 17 Q. And how do you make the hair growth 18 products? 19 A. I make it from home. 100% organic 20 products. 21 Q. And did you receive any income from 22 that? 23 A. Around a hundred dollars. 24 Q. And do you do people's hair at your 25 home?	Page 54 1 Q. And you indicated it was due to COVID; 2 is that right? 3 A. No, it wasn't due to COVID. It was 4 due to what happened. I stopped everything. 5 Q. Okay. And what do you mean by "what 6 happened"?
	7 A. What Eric did, what Tay and his 8 daughter did, what Alesha did. 9 Q. So your testimony is that your 10 employment at Sonic and what you experienced 11 there made you stop your hair product business?
	12 A. Yes. Yes. 13 Q. And it was not due to COVID, as stated 14 in your interrogatories; is that correct? 15 A. No, it's not -- it wasn't due to 16 COVID. 17 Q. And if you look on page 16 of your 18 interrogatory responses, you indicated under 19 your employment with Superior Hair Growth 20 Products, under G --
	21 A. I think I was already on that page. 22 But no, it wasn't due to COVID. I looked over 23 -- I must have missed it, but it wasn't due to 24 COVID. 25 Q. Okay. After you left Sonic at the end
Page 55 1 A. No. 2 Q. Okay. How did you sell the products? 3 A. What do you mean, how? 4 Q. How did you -- did you sell them in a 5 store, or did you sell them to your neighbors 6 and friends? How did you sell the products? 7 A. No, I sold them to -- I had an LLC, 8 and I would sell it to whoever wanted the 9 products. 10 Q. Okay. And how much income did you 11 receive from the products? 12 A. \$100. 13 Q. That's all? 14 A. That's all. 15 Q. Okay. How much did you sell the 16 products for? 17 A. \$4. It -- it depends on what -- the 18 most I sold it for was, like, \$6. 19 Q. Okay. 20 A. But I often -- I was just on -- I 21 would mainly have, like, a sale, you know, have 22 it at a low price starting out. 23 Q. Okay. And you stopped that in January 24 of 2020? 25 A. Yes.	Page 55 1 of December of 2019, what did you do in order to 2 find other employment? 3 A. I searched online. I called places. 4 I went places. 5 Q. And where did you search online? 6 A. Indeed. 7 Q. And did you apply for unemployment 8 after you left Sonic? 9 A. No. 10 Q. And why not? 11 A. I guess it didn't really cross my 12 mind. I'm -- it didn't cross my mind to apply 13 for unemployment. 14 Q. And why is that? 15 A. I don't know. 16 Q. And when -- your husband received 17 unemployment; is that right? He received \$600 a 18 week for the COVID unemployment; is that right? 19 A. Yes. 20 Q. And why did you not apply for 21 unemployment at that point when you learned that 22 you could receive a significant amount a week 23 for COVID? 24 A. It wasn't about the money. It wasn't 25 about that.

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<p style="text-align: right;">Page 58</p> <p>1 Q. So you did not apply for unemployment 2 because it was not about the money?</p> <p>3 A. No, it wasn't about the money.</p> <p>4 Q. But -- but you knew that you could 5 receive a significant amount of money due to the 6 pandemic unemployment; isn't that right?</p> <p>7 A. I wasn't sure if I could. I wasn't 8 sure if I could -- I really -- it -- it really 9 wasn't on my mind. I was depressed. I was 10 really depressed. Maybe I wasn't just clearly 11 thinking straight, but....</p> <p>12 Q. So you said that you searched online 13 through Indeed. What places did you call?</p> <p>14 A. I called Smokey's and asked them was 15 they hiring. I called to check on up on my 16 application in West Point at Popeyes. I called 17 -- I called Hardee's or Burger King. One of 18 them I did online and one of them I called them. 19 I'm not sure which one was which.</p> <p>20 Q. Anyone else that you called?</p> <p>21 A. I can't remember.</p> <p>22 Q. Were there periods of time where you 23 did not look for a job at all?</p> <p>24 A. When I was depressed. It's like some 25 days will be good, some days will be bad.</p>	<p style="text-align: right;">Page 60</p> <p>1 because of his income. I'm not sure. But if -- 2 if they are denied, then he's going to add us -- 3 all us on.</p> <p>4 Q. Okay. Now, it looks like, according 5 to your responses to interrogatories -- let's 6 see. It would be response to Interrogatory 7 Number 10. It looks like you applied to 8 positions in January and February and March of 9 2020. Is that right?</p> <p>10 A. Yes.</p> <p>11 Q. It looks like you applied to three 12 positions in January; is that correct?</p> <p>13 A. Correct.</p> <p>14 Q. And four positions in February of 15 2020; is that right?</p> <p>16 A. Correct.</p> <p>17 Q. And seven positions in March; is that 18 right?</p> <p>19 A. March. (Witness reviews document.)</p> <p>20 Yes.</p> <p>21 Q. And it looks like you did not apply to 22 any positions at all between August of 2020 and 23 April 25th of 2021; is that right?</p> <p>24 A. August 2020? In August -- I was 25 having trouble off and on during my pregnancy.</p>
<p style="text-align: right;">Page 59</p> <p>1 Q. Have you ever suffered from depression 2 before?</p> <p>3 A. No, ma'am. Never.</p> <p>4 Q. Did you have health insurance through 5 your husband's job?</p> <p>6 A. No.</p> <p>7 Q. Did you have health insurance through 8 some type of a state -- Medicare, Medicaid, 9 health insurance for women who were having 10 children?</p> <p>11 A. I had that after I had -- when I was 12 pregnant with my son, when I was -- a few months 13 -- like, three months after I had my son, I had 14 Medicaid then.</p> <p>15 Q. Are your children covered by your 16 husband's health insurance?</p> <p>17 A. No.</p> <p>18 Q. And do you currently have any health 19 insurance?</p> <p>20 A. No.</p> <p>21 Q. Okay. Does your husband have health 22 insurance?</p> <p>23 A. Yes. My children had Medicaid. We 24 just got recertified. I'm waiting to hear if I 25 got approved or denied. I might have got denied</p>	<p style="text-align: right;">Page 61</p> <p>1 I applied for Sitel, and I was working there in 2 2020 from September to October sometime. And 3 then I became ill. I tried to see could I get a 4 leave so I could have my job back when I -- but 5 they said that I wasn't there long enough to do 6 that.</p> <p>7 Q. Okay. And so I guess after you left 8 Sitel in October of 2020, you didn't apply to 9 any positions until April 25th of 2021; is that 10 right?</p> <p>11 A. Well, I had -- I had my baby in 12 December, and he was born with that heart -- his 13 heart condition. And I knew it's no way I could 14 work and be there for him. So no, I didn't 15 apply.</p> <p>16 Q. Okay. And then it looks like you 17 applied to five positions on April 25th of 2021 18 by an internet site; is that correct?</p> <p>19 A. Correct.</p> <p>20 Q. And did any of those people call you 21 back?</p> <p>22 A. I didn't hear anything, you know, from 23 anyone. I never talked to anyone. This one guy 24 I spoke to, he said he would call me back or 25 something; but I never heard anything from him.</p>

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<p>1 Q. And where did you -- where did you 2 speak to somebody? Which of the employers?</p> <p>3 A. That was at -- oh, no. No. That was 4 about the Sitel, trying to get back -- my job 5 back at Sitel. Someone said they'll get in 6 touch with me.</p> <p>7 Q. I see. I see. And did you -- other 8 than applying to these positions on April 25th, 9 did you call any of these businesses? Did you 10 ever call Wendy's?</p> <p>11 A. I'm pretty sure I did, but I don't 12 remember.</p> <p>13 Q. Okay. Do you ever remember calling 14 Focus Workforce Management?</p> <p>15 A. No, I didn't call them.</p> <p>16 Q. And did you ever call Jack's Family 17 Restaurant?</p> <p>18 A. No, ma'am.</p> <p>19 Q. And then it looks like there's a 20 period between April 25th of 2021 and then 21 August 31st of 2021 where you did not apply for 22 any positions; is that right?</p> <p>23 A. August? I did apply. In August I did 24 apply.</p> <p>25 Q. Right. In between April of 2021 and</p>	<p>1 find employment after August 31st?</p> <p>2 A. Well, I was trying to get at my 3 sister's restaurant. She's opening her a 4 restaurant, and she -- I was kind of waiting on 5 that. She said when business pick up.</p> <p>6 Q. And what restaurant does your sister 7 own?</p> <p>8 A. It's called J A & B's Kitchen.</p> <p>9 Q. And where is it located?</p> <p>10 A. It's on Highway 45 -- it's 45 North by 11 -- the same highway McDonald's on. I think 12 that's 45 North? Yeah.</p> <p>13 Q. Has your sister had any issues finding 14 people to work at her restaurant?</p> <p>15 A. The only person that working with her 16 right now is my mother. She trying to wait till 17 business pick up before she just hires somebody.</p> <p>18 Q. Okay. And other than you have put on 19 your responses to interrogatories, that's your 20 only efforts to find other employment; is that 21 right?</p> <p>22 A. I filled out something a few days ago.</p> <p>23 Q. And what did you fill out?</p> <p>24 A. I filled out an application -- may I 25 grab my phone? It's in -- well, it was at</p>
<p>1 August of 2021, you did not apply for any 2 positions; is that correct?</p> <p>3 A. In August I did. I think it might 4 have been -- it might have before after this or 5 something. No, it wasn't. I think that -- it 6 was before this. I think I sent that in. I 7 thought I sent that in.</p> <p>8 Q. So if we look at -- do you have 9 Exhibit Number 2 in front of you?</p> <p>10 A. Let's see. August. Oh, August 31st.</p> <p>11 Q. That's right. It looks like there's a 12 period between April 25th of 2021 and August 13 31st of 2021 that you did not apply for any 14 positions; is that right?</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. Okay.</p> <p>17 A. I'm sorry. I -- it was in August, 18 yes. You're correct. I'm sorry.</p> <p>19 Q. And then it looks like you applied for 20 four positions in August of 2021; is that right?</p> <p>21 A. Correct. It was in August, yes.</p> <p>22 Q. And did you hear back from any of 23 those positions?</p> <p>24 A. No, ma'am.</p> <p>25 Q. And have you made any other efforts to</p>	<p>1 Wendy's in Aberdeen.</p> <p>2 Q. And when did you apply for that?</p> <p>3 A. It was sometime this month. And I 4 called --</p> <p>5 Q. November?</p> <p>6 A. Yes. And I called them as well.</p> <p>7 Q. And what did they say or -- did they 8 hire you?</p> <p>9 A. They was -- they closed early. They 10 -- I didn't get in touch with anyone. And I 11 didn't call back after that.</p> <p>12 Q. How did you find your job at Sitel?</p> <p>13 A. Through Indeed.</p> <p>14 Q. And who was your supervisor at Sitel?</p> <p>15 A. My online instructor was Tameka? I 16 want to say her name was Tameka.</p> <p>17 Q. And how long did you work at Sitel?</p> <p>18 A. From September to October sometime.</p> <p>19 Q. Okay.</p> <p>20 A. I was there for about six weeks.</p> <p>21 Q. And what was your position there?</p> <p>22 A. I was taking calls, training to take 23 calls and stuff.</p> <p>24 Q. Was that a job that you performed from 25 home or did you have to go to the Sitel</p>

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<p>1 location?</p> <p>2 A. It was from home.</p> <p>3 Q. And how much did you earn an hour at</p> <p>4 Sitel?</p> <p>5 A. It was 9. Either 9 -- between 9 and</p> <p>6 9.50. Let me see. Let me go....</p> <p>7 Q. So if you state in your responses to</p> <p>8 so interrogatories it was 9.25 --</p> <p>9 A. 9.25. Yes.</p> <p>10 Q. Okay. And how many hours a week were</p> <p>11 you going to work at Sitel?</p> <p>12 A. I was working 40 hours.</p> <p>13 Q. And had you gotten past the training</p> <p>14 process?</p> <p>15 A. I can't remember -- I really can't</p> <p>16 remember, like....</p> <p>17 Q. Okay. And you said Tameka was your</p> <p>18 trainer?</p> <p>19 A. Yes. Her name was Tameka.</p> <p>20 Q. And did you get along with Tameka?</p> <p>21 A. Yes.</p> <p>22 Q. And did you think she was a fair</p> <p>23 trainer?</p> <p>24 A. Yes.</p> <p>25 Q. And did you have a supervisor at</p>	Page 66	Page 68
<p>1 Sitel, or was Tameka your supervisor?</p> <p>2 A. All I know was Tameka, you know. She</p> <p>3 was the one who was over us, you know, that</p> <p>4 particular class.</p> <p>5 Q. Okay.</p> <p>6 A. That's what I mean by this.</p> <p>7 Q. And what were the hours that you were</p> <p>8 training?</p> <p>9 A. Eight hours a week -- eight hours a</p> <p>10 day.</p> <p>11 Q. And what hours were you working?</p> <p>12 A. From 8:00 to 5:00.</p> <p>13 Q. And how were you able to work from</p> <p>14 8:00 to 5:00 and homeschool your four -- three</p> <p>15 children?</p> <p>16 A. Oh. I was able to -- with</p> <p>17 homeschooling, it's not a set time when you --</p> <p>18 when I get off work, we do schoolwork. When I</p> <p>19 get off work, we -- we would do schoolwork.</p> <p>20 Q. Okay.</p> <p>21 A. And sometimes, like -- at that time my</p> <p>22 husband, he would, you know, also do the little</p> <p>23 games and stuff and read with them. But I did</p> <p>24 the main teaching part, so....</p> <p>25 Q. And you would do that after 5:00?</p>	Page 67	Page 69

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<p>1 nausea, vomiting.</p> <p>2 Q. Okay. Nausea and what?</p> <p>3 A. Vomiting.</p> <p>4 Q. Okay. Any other -- were there any</p> <p>5 other complications with your pregnancy?</p> <p>6 A. I can't remember. Those I remember</p> <p>7 off top.</p> <p>8 MS. TAYLOR: Okay. Would it be okay</p> <p>9 if we took a quick break so I could make a</p> <p>10 phone call?</p> <p>11 MR. STUTZMAN: Okay.</p> <p>12 MS. TAYLOR: And I will say, please</p> <p>13 don't discuss your deposition testimony</p> <p>14 with anyone during the break. Okay?</p> <p>15 THE WITNESS: I won't.</p> <p>16 MS. TAYLOR: And I am really sorry. I</p> <p>17 will try to make this as quick as possible.</p> <p>18 (Brief recess.)</p> <p>19 A. May I say something?</p> <p>20 BY MS. TAYLOR:</p> <p>21 Q. Absolutely.</p> <p>22 A. I want to go back and -- I got it</p> <p>23 wrong. It was -- November the 1st it was Pizza</p> <p>24 Hut that I applied for. Pizza Hut.</p> <p>25 Q. November the 1st.</p>	<p style="text-align: center;">Page 70</p> <p>1 disciplined quite a few times while working at</p> <p>2 Food Giant, would that be consistent with your</p> <p>3 memory of being disciplined while you worked</p> <p>4 there?</p> <p>5 A. I don't never remember being suspended</p> <p>6 or disciplined or anything.</p> <p>7 Q. Okay. Let me show you --</p> <p>8 A. I take that back. I think I did get a</p> <p>9 write-up or something.</p> <p>10 Q. If you got five write-ups while you</p> <p>11 worked at Food Giant, would you have any reason</p> <p>12 to dispute that?</p> <p>13 A. Correct. I would dispute that because</p> <p>14 I don't remember -- five write-ups?</p> <p>15 Q. That's correct.</p> <p>16 A. No, ma'am. I'm not aware of that.</p> <p>17 Q. Okay. Okay. Let me show you --</p> <p>18 MS. TAYLOR: We'll mark this as</p> <p>19 Exhibit 3.</p> <p>20</p> <p>21 - - - - -</p> <p>22 (Exhibit Number 3 marked.)</p> <p>23 BY MS. TAYLOR:</p> <p>24 Q. I apologize that this is not a good</p> <p>25 copy. This exhibit is dated November 1st of</p>
<p>1 A. Yes.</p> <p>2 Q. Okay. Okay. And, Ms. Haughton, I</p> <p>3 should have said this earlier. I -- if there's</p> <p>4 anything that you need to go back and change as</p> <p>5 we're talking today, please do exactly what you</p> <p>6 just did. Just let me know and you can revisit.</p> <p>7 Okay?</p> <p>8 A. Okay. And I also want to state that</p> <p>9 when I was doing the work online with Sitel, on</p> <p>10 my lunch breaks I would go check -- because they</p> <p>11 got a laptop that they would do they work on,</p> <p>12 you know, and I would go check -- you know, they</p> <p>13 pretty much knew what to do, but I would go over</p> <p>14 it -- after work I would go over everything with</p> <p>15 them to make sure they understood it.</p> <p>16 Q. Okay. Okay.</p> <p>17 Okay. So to go back to your</p> <p>18 employment at Food Giant, when you worked at</p> <p>19 Food Giant, you understood that your employment</p> <p>20 was at will, meaning that you could quit for any</p> <p>21 reason or you could be terminated for any reason</p> <p>22 without notice?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Now, if the records that Food</p> <p>25 Giant produced indicated that you had been</p>	<p style="text-align: center;">Page 71</p> <p>1 2013, and it -- under Number 3 it says, Explain</p> <p>2 the standards, policies, and practices. It</p> <p>3 says, We will not put up with anyone mistreating</p> <p>4 any customer at any time.</p> <p>5 A. I've never signed anything with all of</p> <p>6 this together like this. And I -- I don't</p> <p>7 remember -- I didn't know I was -- I remember</p> <p>8 one write-up, but I explained -- she told me</p> <p>9 that it was okay about the customer. I</p> <p>10 explained to her that I never got an attitude.</p> <p>11 All I ever did was treat customers with respect.</p> <p>12 Q. Okay. Is that your signature on the</p> <p>13 bottom of that document?</p> <p>14 A. Yes, that's correct.</p> <p>15 Q. Okay. And do you remember being</p> <p>16 issued an Associate Discipline Record for being</p> <p>17 rude to a customer?</p> <p>18 A. I don't remember this paper. No, I</p> <p>19 don't remember this paper at all.</p> <p>20 Q. Okay.</p> <p>21 A. That is my signature, but I do not</p> <p>22 remember this paper at all.</p> <p>23 Q. Okay. Do you ever remember being</p> <p>24 presented with a disciplinary record and</p> <p>25 refusing to sign it?</p>

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<p>1 A. Refusing to sign it. I don't 2 remember; but if I felt like something -- you 3 know, if I was being truthful about something, 4 then it might have. I don't know.</p> <p>5 Q. Okay.</p> <p>6 A. I really don't know.</p> <p>7 Q. Okay.</p> <p>8 MS. TAYLOR: We'll mark this as 9 Exhibit Number 4.</p> <p>10 - - - - -</p> <p>12 (Exhibit Number 4 marked.)</p> <p>13 BY MS. TAYLOR:</p> <p>14 Q. Now, Exhibit Number 4 is dated January 15 12th of 2014. It indicates that a customer said 16 that she was at the hot bar waiting on Shearson 17 to help her, that you were on the phone at the 18 time; and that when you got off the phone, you 19 turned and walked off and did not come back to 20 see what the customer wanted.</p> <p>21 A. No, that's not true.</p> <p>22 Q. Okay.</p> <p>23 A. When I worked at Food Giant, I was the 24 only one at the front. They would leave me and 25 when -- I was the only one who really worked the</p>	<p>1 should I attend to a customer. They never -- 2 that's something they never explained to me. My 3 thinking was check on this food, then attend to 4 the customer.</p> <p>5 Q. And do you recall -- do you recall 6 refusing to sign this form?</p> <p>7 A. Because I -- I felt like it wasn't 8 right because they didn't tell me that, oh, you 9 -- you take care of the customer, then the food. 10 Then you go attend to the food. They never told 11 me attend to the customer first.</p> <p>12 It was a lot of times at Food Giant 13 when I was out there, somebody would -- in the 14 kitchen would cook -- because I also used to 15 bake, like, cookies and roast chicken and stuff 16 at Food Giant. And I felt like that wasn't 17 right. That's why I didn't sign that because I 18 wasn't told.</p> <p>19 Q. But you do remember it being --</p> <p>20 A. Yes.</p> <p>21 Q. -- brought up to you.</p> <p>22 A. I do now, yes.</p> <p>23 Q. Okay.</p> <p>24 A. And when she said smile at customers, 25 I said, I do smile. She said, But you got to</p>
<p>1 front without help. I trained myself, really, 2 because -- I never turned my back on a customer. 3 It may have been a time when I was on the phone 4 and I acknowledged the customer hold on a second 5 because I've got something cooking or something, 6 but I never -- I don't recall this at all.</p> <p>7 Q. Do you remember being told when you 8 worked at the Food Giant that you need to take 9 care of customers and be friendly to customers?</p> <p>10 A. No. I know she said that -- she told 11 me to smile more. She did tell me to smile 12 more. She did say that.</p> <p>13 Q. Okay. And do you remember refusing to 14 sign this disciplinary form?</p> <p>15 A. I didn't know I was disciplined for 16 not smiling at the customers.</p> <p>17 Q. Actually I'm referring to the 18 disciplinary form marked Exhibit 4 that states 19 that you turned and walked away from a customer 20 after being on a phone call. Do you remember 21 refusing to sign the form?</p> <p>22 A. And then I do know she told me -- I 23 said I was never told you take care of customer 24 if -- you know, you take care of customer -- I 25 didn't know should I turn to go get the food or</p>	<p>1 keep a smile. You know, it's hard to -- it's 2 not like I was frowning up. She wanted me to 3 smile all the time.</p> <p>4 Q. Okay.</p> <p>5 A. That's what she wanted.</p> <p>6 Q. Now, you could understand that, you 7 know, in that type of a business, a grocery 8 store, that you would need to be courteous to 9 customers and make sure that they had a good 10 experience; is that correct?</p> <p>11 A. I do --</p> <p>12 MR. STUTZMAN: Object to the form.</p> <p>13 BY MS. TAYLOR:</p> <p>14 Q. Is that correct?</p> <p>15 A. I do --</p> <p>16 MR. STUTZMAN: You can answer it. You 17 can answer it.</p> <p>18 A. I do want to clarify that I was never 19 rude. What it was, I would say, Hey, how are 20 you doing, you know. But she wanted me to 21 smile, you know, be jolly, more jolly. She 22 wasn't saying I wasn't doing it. She said I 23 wasn't doing it enough.</p> <p>24 Q. Okay. So just to restate my question, 25 you do understand that in a business like Food</p>

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<p>1 Giant, that you would need to be courteous to 2 customers and make sure that they have a good 3 experience in the store; is that right?</p> <p>4 MR. STUTZMAN: Object to the form.</p> <p>5 You can answer.</p> <p>6 A. Yes.</p> <p>7 MS. TAYLOR: Okay. Let's go ahead and 8 mark this as the next exhibit.</p> <p>9</p> <p>10 - - - -</p> <p>11 (Exhibit Number 5 marked.)</p> <p>12 BY MS. TAYLOR:</p> <p>13 Q. Now, this exhibit is dated -- and it's 14 Exhibit Number 5. Exhibit Number 5 is dated 15 January the 30th of 2014, and it's signed by 16 Shirley Carter. That's your supervisor; is that 17 correct?</p> <p>18 A. Yes. Yes, that's her name.</p> <p>19 Q. And it states that you were not going 20 to sign this, that you said you would not sign 21 it.</p> <p>22 But do you recall indicating to your 23 supervisors that you would come in and work an 24 evening and that you did not show up and did not 25 call? Do you remember being counseled about</p>	<p>1 being a no-call/no-show?</p> <p>2 A. I don't -- I don't remember that. I 3 do not remember at all. If she wrote it -- she 4 didn't hand it to me if she did. This is not 5 even signed.</p> <p>6 Q. Is that not?</p> <p>7 A. No. I don't even remember this paper.</p> <p>8 Q. You don't remember ever being 9 presented this on the 31st?</p> <p>10 A. No, ma'am.</p> <p>11 Q. Do you remember having a conversation 12 with Shirley Carter on the 2nd of the 14th that 13 you came in to get your check and that you told 14 them you were through?</p> <p>15 A. I was -- no, ma'am. That's not true.</p> <p>16 Q. Okay. So you didn't tell them you 17 were through?</p> <p>18 A. No, ma'am. The day I left work, 19 Shirley was not even there.</p> <p>20 Q. Do you ever remember having to come 21 back in and get your check after being absent?</p> <p>22 A. After I left I got my check. That's 23 -- you know, I had another check to get anyway 24 after I left. It's not that. I had a 25 conversation with her. I didn't talk to Shirley</p>
<p>1 that?</p> <p>2 A. I remember that it wasn't my day to 3 work, and I told her that I would try my best to 4 come in. I never said that -- I said that I 5 would try my best. So that's why I got in 6 trouble for that.</p> <p>7 Q. Okay. But you do remember them --</p> <p>8 A. I remember --</p> <p>9 Q. -- talking to you about that.</p> <p>10 A. Yes.</p> <p>11 Q. And do you recall not showing up the 12 next day to work --</p> <p>13 A. I don't --</p> <p>14 Q. -- on the 31st of January?</p> <p>15 A. I don't recall that.</p> <p>16</p> <p>17 - - - -</p> <p>18 (Exhibit Number 6 marked.)</p> <p>19 BY MS. TAYLOR:</p> <p>20 Q. So this looks like it's dated January 21 31st of 2014, Exhibit 6. There's the Associate 22 Disciplinary Record. It indicates that you were 23 scheduled to work from 12:00 to 7:00 and that 24 you were a no-call/no-show. Do you ever 25 remember being given a disciplinary warning for</p>	<p>1 again after I left. That day I left, Shirley 2 wasn't even there.</p> <p>3 Q. Okay. So you don't remember Shirley 4 giving you the final write-up, the fifth 5 write-up, and you refusing to sign it?</p> <p>6 A. I didn't -- this is new to me. This 7 here is new to me. Now, about the smiling of 8 the customers, that's true. But this is new to 9 me.</p> <p>10 Q. Okay.</p> <p>11 MS. TAYLOR: Go ahead and mark this as 12 Exhibit Number 7.</p> <p>13</p> <p>14 - - - -</p> <p>15 (Exhibit Number 7 marked.)</p> <p>16 A. This is so new -- I never in my life 17 seen this before.</p> <p>18 BY MS. TAYLOR:</p> <p>19 Q. So you don't recall your supervisor, 20 Shirley Carter, giving you an Associate 21 Discipline Record on the 2nd?</p> <p>22 A. No, ma'am. She didn't.</p> <p>23 Q. Do you know if you're eligible to be 24 rehired at Food Giant?</p> <p>25 A. One day I went there and Shirley was</p>
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1 like, Come on back here and help us. So I'm -- 2 as far as I know, yes. 3 Q. Okay. And if their records indicate 4 that you are not eligible to be rehired, would 5 you have any reason to dispute that? 6 A. It'll be new to me. I didn't know 7 because she did say "Come on back here and help 8 us" one day. 9 Q. You had mentioned Dwayne. Is that 10 Dwayne Jackson? 11 A. Yes. 12 Q. Is that the -- 13 A. He's the store manager. 14 Q. -- the store manager? And if Dwayne 15 Jackson said that you're not eligible to be 16 rehired there, you would dispute that? 17 A. I -- it -- I didn't know anything 18 about it if I wasn't able to work there again. 19 20 - - - - 21 (Exhibit Number 8 marked.) 22 BY MS. TAYLOR: 23 Q. Okay. Now, it appears that Dwayne 24 Jackson, in this note dated February 17th of 2014, 25 said that you had been a problem employee	1 that's not true at all. 2 Q. Okay. 3 A. A lot of these are false information. 4 Q. Okay. Now, when you worked at Sitel, 5 did you understand that your employment was at 6 will, meaning you could quit your job for any 7 reason and you could be terminated for any 8 reason without notice? 9 A. Yes. I thought it was everything 10 except discrimination. 11 Q. Okay. Now, you worked for Sonic on 12 two occasions; isn't that correct? 13 A. Correct. 14 Q. And how did you find out about the job 15 at Sonic? 16 A. I can't remember. The second time I 17 think I seen it on Indeed. I saw it on Indeed. 18 Q. And the first time that you worked for 19 Sonic, when was that? 20 A. I want to say it was in 2014, 2015, 21 one of those. 22 Q. And why did you leave Sonic the first 23 time? 24 A. I was sick. I was ill, very ill then. 25 And I didn't know I was pregnant then.
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1 from the start and have been given chances to 2 improve but has not, and that you had gone on 3 break on Sunday and never returned and said you 4 quit. Do you remember doing that? 5 A. Joanne Pointer is dead. 6 Q. Could you say that one more time? 7 A. Joanne Pointer, she's deceased. 8 Q. Okay. And when did she pass away? 9 A. I never went to her. 10 Q. When did she pass away? 11 A. She passed away -- I want to say it 12 was in 2018. 13 Q. So it would be sometime after 2014? 14 A. Yes. But this is new to me. I never 15 went to Joanne and asked her to work for me. My 16 son got sick. I didn't know he -- and my phone 17 did die. My phone was dead. I rushed him to 18 the hospital, didn't have no phone charger or 19 nothing. February the 14th, 2014. You can 20 contact the hospital. 21 Q. Okay. And so the record saying that 22 you went on break on Sunday and never returned 23 and called and said you quit, that would be 24 consistent with what happened? 25 A. No, ma'am, that's not true. God knows	1 Q. And so you quit your position the 2 first time? 3 A. No. The first time I was fired 4 because I did miss then. I didn't come in. I 5 was sick that day. And I hadn't been there that 6 long. 7 Q. If you only worked at Sonic the first 8 time for just a couple of weeks, would that be 9 consistent with your memory? 10 A. I don't remember, but I know it wasn't 11 long. 12 Q. Okay. What was your position the 13 first time? 14 A. I was a -- I fixed sandwiches, and I 15 was a -- I was a cook. 16 Q. A cook? Okay. And who was the 17 managers at Sonic the first time? 18 A. Alesha, Eric, and Teresa. And also 19 Allison Brown. 20 Q. And what was your schedule the first 21 time you worked at Sonic? 22 A. I only worked, like, two, three hours. 23 Q. You only worked for a couple of hours? 24 A. Yes. 25 Q. Okay. So it was a very short period

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1 of time.	1 Teresa was there or Alesha.
2 A. Yes, ma'am.	2 Q. Okay. And did you think Teresa was a
3 Q. Okay. Did you have any issues the	3 fair supervisor?
4 first time that you worked?	4 A. Besides sending me home early, yes.
5 A. I didn't have any issues the first	5 Other than that, yes.
6 time.	6 Q. Okay. Why did she send you home
7 Q. When you worked for just a couple of	7 early?
8 hours, do you remember if you worked in the day	8 A. Because she said that work was slow
9 or if you worked at nighttime?	9 and she needed to get, you know, some people off
10 A. Then -- I can't remember. I can't	10 of the clock.
11 remember then. It might have been both. I'm	11 Q. I see. And do you have any reason to
12 not sure.	12 believe Allison Brown would say anything
13 Q. Okay. And the second time that you	13 untruthful about you?
14 worked for Sonic, how did you find out about the	14 A. Not that I know of.
15 position?	15 Q. Did you know Eric Ellis before you
16 A. The second time I called her and --	16 worked at Sonic?
17 the first -- no, the second time I seen it on	17 A. I never knew him until I worked at
18 Indeed, and then I called her and --	18 Sonic.
19 Q. And who did you call?	19 Q. And did you get along with him other
20 A. I called Sonic and talked to Alesha.	20 than this incident?
21 Q. Did you know Alesha before you worked	21 A. Yes, we got along.
22 at Sonic?	22 Q. And do you think he was a fair
23 A. No.	23 supervisor?
24 Q. And you said Teresa was also a manager	24 A. No.
25 the first time?	25 Q. And why is that?
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1 A. Yes. Teresa and Allison Brown.	1 A. Because -- because of what he did to
2 Q. Okay. What's Teresa's last name?	2 me.
3 A. Williams.	3 Q. And Alesha, is that -- is it Alesha
4 Q. Did you know Teresa?	4 Gardner?
5 A. I know Teresa.	5 A. Yes.
6 Q. And how did you know Teresa?	6 Q. And did you get along with Alesha?
7 A. She used to work in the cafeteria at	7 A. The only time that I really -- we got
8 school, and she also used to hang with my	8 along; but when I tried to tell her, she didn't
9 cousin.	9 try to hear me.
10 Q. Did you get along with Teresa?	10 Q. Say that again? When you tried to
11 A. Yes.	11 tell her, she what?
12 Q. And do you have any reason to believe	12 A. She cut me off. She wasn't trying to
13 Teresa would say anything untruthful about you?	13 hear me. She wasn't trying to listen.
14 A. I didn't do anything. Not that I know	14 Q. Now, the second time that you worked
15 of.	15 at Sonic, who were the supervisors?
16 Q. Okay. What about Allison Brown? Did	16 A. It was -- Alesha was the manager, and
17 you know Allison Brown before you worked at	17 then it was Eric and then Tay.
18 Sonic?	18 Q. And what's Tay's last name?
19 A. I knew of her.	19 A. I think it's Davis. Her real name
20 Q. And did you get along with her?	20 Shaquika or something.
21 A. Yes.	21 Q. Okay. Would Randle sound like her
22 Q. Do you think that she was a fair	22 last name or -- you think it was Davis?
23 supervisor?	23 A. I know that she said something about
24 A. I wasn't really -- she was there	24 she was married or something once.
25 sometimes, but I really mainly was there when	25 Q. Okay.

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1 A. So I don't know if Davis or Randle her 2 married name, but she went by Davis up there. 3 Q. Okay. And did you get along with Tay? 4 A. Me and Tay got along real good. 5 Q. Okay. And do you think Tay was a fair 6 supervisor? 7 A. Up until the incident with Eric, yes. 8 Q. Who interviewed you when you applied 9 for the position? 10 A. Alesha did. 11 Q. Alesha? 12 A. Yes, ma'am. 13 Q. Okay. And at the time you were hired, 14 you were provided a copy of Sonic's policies; 15 isn't that right? 16 A. I never received a copy of -- I signed 17 some documents, but I never had anything to take 18 home with me. 19 Q. Okay. But there was a copy of the 20 handbook that was there -- 21 A. I never read it -- I never -- they 22 never gave it to me to take home. You know, I 23 signed some documents, you know. 24 Q. Okay. But one was made available to 25 you; isn't that correct?	1 characteristic; isn't that right? 2 A. Correct. 3 Q. And that Sonic's policy required 4 employees to report any incidents of 5 discrimination or harassment; isn't that 6 correct? 7 A. Yes. 8 Q. Okay. And you understood that you 9 could report incidents of harassment to your 10 manager all the way up to the owner of the 11 company; isn't that right? 12 A. Well, I went to Alesha, and I tried to 13 talk to her. 14 Q. Well, I'm just talking about at the -- 15 at the beginning of your employment, you 16 understood that you could report those claims up 17 the management chain all the way to the 18 corporate office; isn't that correct? Because 19 you called the corporate office. 20 A. No. At first she never mentioned it. 21 She told -- she never mentioned anything about 22 if you have problems you can call corporate. 23 She never said anything like that. 24 Q. And how did you call corporate, then? 25 How did you know how to call corporate?
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1 A. Not to take home with me. 2 Q. Right. 3 A. They never gave me a copy. 4 Q. Right. But one was made available to 5 you at the store; isn't that right? 6 A. I don't know. They never said it -- 7 that -- well, here's the handbook. They never 8 said that. I just -- when I got hired, it was 9 papers that I signed, and that was it. They 10 never said, Here's the handbook if you need to 11 look through it or anything. They never said 12 that. 13 Q. They never told you that there was a 14 handbook? 15 A. They never -- I never saw -- I never 16 got a handbook. I signed some documents that 17 said something about discrimination. I don't 18 know if those were copies of the handbook or 19 what. 20 Q. Okay. But you understood that Sonic 21 had a policy that prohibited discrimination; 22 isn't that right? 23 A. Correct. 24 Q. And also a policy that prohibited 25 harassment based on sex or any other	1 A. I called corporate -- I googled the 2 number I was just trying to -- I googled the 3 number to corporate. That's how I got in touch 4 with corporate. 5 Q. Okay. But you did call corporate in 6 order to report it? 7 A. The number I called at first was in 8 another state or something. It was the wrong 9 one. So I kept googling till I found the right 10 one in Columbus -- 11 Q. Okay. 12 A. -- to call. 13 Q. Okay. Now, the second time that you 14 worked for Sonic, you earned \$7.25 an hour; is 15 that right? 16 A. Yes, until I became a manager. 17 Q. And I don't see in the documents 18 anywhere when you were hired that you were a 19 manager-in-training. What -- your position is 20 that you were going to become a manager at 21 Sonic? 22 A. Yes. I was training to be a manager. 23 Alesha even told Claudia. 24 Q. And who is Claudia? 25 A. That's Tay's auntie. And she said,

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<p>Page 94</p> <p>1 Oh, so you're training to be a manager. And I 2 said, How do you know? And she said, Alesha 3 told me. And I said, Yes. She said, Well, they 4 wanted me to be a manager, but I didn't want to 5 be nairn.</p> <p>6 Q. Did Claudia work at Sonic?</p> <p>7 A. Yes, ma'am.</p> <p>8 Q. Okay. Did Alesha ever tell you that 9 you were going to be a manager?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. And when did she tell you that?</p> <p>12 A. She told me when I was hired it was 13 for that position and that in February I was 14 supposed to be a manager.</p> <p>15 Q. But you weren't a manager-in-training; 16 isn't that right?</p> <p>17 A. I was a manager-in-training.</p> <p>18 Q. You're saying that your position while 19 you worked at Sonic was as a 20 manager-in-training?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. And if Sonic's records don't indicate 23 that you were a manager-in-training, do you have 24 any reason why that would be?</p> <p>25 A. I don't understand why.</p>	<p>Page 96</p> <p>1 Q. And you're saying that she did that at 2 the time that she hired you?</p> <p>3 A. When she hired me, I was supposed -- I 4 was told that I was an MIT is what she said. 5 Manager-in-training. And she said that she 6 couldn't just start me off as a manager, so she 7 would train me to be a manager; and after three 8 months, if I was doing good, then I would be a 9 manager.</p> <p>10 Well, right before this incident 11 happened, like, around Thanksgiving -- it was 12 after Thanksgiving. She was like, You're doing 13 a good job; keep it up. February you'll be a -- 14 February you'll be a manager, just long as you 15 keep it up.</p> <p>16 Q. And what particular training were you 17 given as a manager?</p> <p>18 A. It was just -- I was trained on 19 everything, like, cooking sandwiches, stocking. 20 I was trained on everything. She told me I was 21 supposed to go -- in January she told me that I 22 would go to the front and start with the carhop. 23 But I never got to that point.</p> <p>24 Q. Now, when it comes to the 25 manager-in-training, you said that you were --</p>
<p>Page 95</p> <p>1 Q. Okay. Do you have anything in writing 2 that states that you were a manager-in-training?</p> <p>3 A. They never gave me anything.</p> <p>4 Q. Did you apply for a 5 manager-in-training position?</p> <p>6 A. I think I -- I'm not sure, but I think 7 I did.</p> <p>8 Q. Do you have any documents that show 9 that you applied for a manager-in-training 10 position?</p> <p>11 A. I don't.</p> <p>12 Q. And tell me exactly what you remember 13 about the conversation about you being a 14 manager-in-training.</p> <p>15 A. She told me that she couldn't start me 16 off as a manager just, you know, coming through 17 the door because she done did that before and it 18 didn't work out right. So she said that she 19 would train me, and she said after three months 20 I could be a manager as long as I had everything 21 down pat. And she told me that -- we had a 22 conversation, and she said, Good job; keep it 23 up. And she told me, You'll be getting right at 24 \$9 and that I would be a manager in February 25 long as I kept doing a good job.</p>	<p>Page 97</p> <p>1 you were -- you were a cook when you were 2 working at Sonic; isn't that right?</p> <p>3 A. I was a cook and I fixed sandwiches, 4 but -- I was a cook. I would fix sandwiches. 5 That's what I started off doing. I also would 6 be on the fryer. And the fryer, that's cooking. 7 But I was supposed to go to the front starting 8 January. But yes, I did start off cooking and 9 fixing sandwiches.</p> <p>10 Q. Okay. And --</p> <p>11 A. And stocking.</p> <p>12 Q. Okay. And so when you're saying that 13 you received training on cooking and stocking, 14 that would be for the position of being a cook?</p> <p>15 A. No. I was supposed to be in -- 16 manager-in-training. To be a 17 manager-in-training, you got to have the cooking 18 down pat. You had to have the sandwiches down 19 pat and the frying down pat. So I was working 20 each area, you know, back and forth with that 21 first before I was moved to the front.</p> <p>22 Q. Okay. I guess what I was asking, did 23 you receive any training that was specific to a 24 manager and not a cook?</p> <p>25 A. No. Well, she said when she wanted to</p>

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1	take me -- she didn't want to take me too fast.	1	-- when I got hired nothing was electronically
2	That's why it was....	2	signed.
3	Q. Now, when you were hired by Sonic, you	3	Q. You didn't go into a computer and sign
4	were paid \$7.25 an hour; isn't that right?	4	any documents?
5	A. Correct.	5	A. I signed computers -- I signed when I
6	MS. TAYLOR: I'm going to mark this as	6	was doing the computer -- the training about the
7	the next exhibit.	7	washing the hands and that training. But I
8	-----	8	never signed this. The day I got hired, I did
9	(Exhibit Number 9 marked.)	9	not -- I haven't seen this form is what I'm
10	BY MS. TAYLOR:	10	saying.
11	Q. Now, Ms. Haughton, this is the --	11	Q. Okay. So tell me what -- what
12	Sonic's New Hire Form, where they indicate your	12	training did you do on the computer when you
13	rate of pay and how you're paid and what your	13	were hired by Sonic?
14	position was. If you look on the very left-hand	14	A. It was telling me about the washing
15	side in the file, it indicates your job code of	15	the hands and -- I can't remember everything,
16	being a cook; isn't that correct?	16	but it was about the temperatures of the food
17	A. No, that's not -- I was told that I	17	and stuff like that, about when you closing, how
18	was an MIT.	18	to close.
19	MS. TAYLOR: Let's go ahead and mark	19	Q. Was it on the process for cooking and
20	this as the next exhibit.	20	what the standards were for Sonic for preparing
21	-----	21	food?
22	(Exhibit Number 10 marked.)	22	A. Yes.
23	BY MS. TAYLOR:	23	Q. Did it go over Sonic's standards of
24		24	conduct?
25		25	A. I can't remember. I can't remember.
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1	Q. And, Ms. Haughton, what is marked as	1	I know the paper I signed, the one I printed and
2	Exhibit --	2	signed in cursive and dated, that one did.
3	MS. TAYLOR: What exhibit number?	3	Q. Went over the standards of conduct?
4	COURT REPORTER: 10.	4	A. Yes.
5	MS. TAYLOR: 10?	5	Q. Did it also go over the
6	BY MS. TAYLOR:	6	nondiscrimination policy?
7	Q. It looks like you electronically	7	A. Yes. The one I signed did.
8	signed this on November 12th of 2019, which is	8	Q. So you understood at that time, at
9	consistent with your hire date; isn't that	9	least, that Sonic had the standards of conduct,
10	right?	10	and they expected their employees to conduct
11	A. That's not correct.	11	themselves consistent with that; isn't that
12	Q. Did you not sign it electronically?	12	right?
13	A. No, ma'am.	13	A. Correct.
14	Q. How did you sign it?	14	MR. STUTZMAN: Object to the form.
15	A. I had a pen signing my papers.	15	You may answer.
16	Q. So you're saying you signed your	16	A. Okay. Correct.
17	Employee Acknowledgment?	17	BY MS. TAYLOR:
18	A. It was a piece of paper. I had to	18	Q. And you understood that Sonic's
19	write in print, sign it, and date it. It was	19	policies prohibited sexual harassment in the
20	not electronically.	20	work place; isn't that right?
21	Q. Okay. Was the form the same?	21	A. Correct.
22	A. I never seen this form before.	22	Q. And you also understood that Sonic's
23	Q. Okay. So you're saying that you did	23	policies prohibited anyone from engaging in
24	not electronically sign this document?	24	threatening or abusive conduct; isn't that
25	A. I would have remembered signing it. I	25	correct?

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<p>1 A. Correct.</p> <p>2 Q. And you understood that Sonic's policy</p> <p>3 prohibited anyone from using profane language in</p> <p>4 the workplace; isn't that right?</p> <p>5 A. Correct.</p> <p>6 MR. STUTZMAN: Robin, how much longer</p> <p>7 do you think we'll be going?</p> <p>8 MS. TAYLOR: Well, you know, it's</p> <p>9 12:09 now. I expect that we will probably</p> <p>10 go for another hour or two hours. So if we</p> <p>11 want to go ahead and take a break now and</p> <p>12 then just reconvene --</p> <p>13 MR. STUTZMAN: I'd like to get some</p> <p>14 lunch.</p> <p>15 MS. TAYLOR: Okay.</p> <p>16 MR. STUTZMAN: I'm getting hungry.</p> <p>17 MS. TAYLOR: I think that's okay.</p> <p>18 Let's go ahead and do that. And how long</p> <p>19 do y'all think we need to take for lunch?</p> <p>20 Do y'all want to take one hour or --</p> <p>21 THE WITNESS: Well, I got dropped off</p> <p>22 here, so I'll probably just stay to make</p> <p>23 sure I don't miss it.</p> <p>24 MR. STUTZMAN: Okay. We can keep</p> <p>25 going.</p>	<p>1 handbook, it was -- I signed it. It wasn't like</p> <p>2 this. It wasn't.</p> <p>3 Q. Okay. Okay. But you do agree, as</p> <p>4 part of your -- Sonic's standards of conduct,</p> <p>5 that they prohibited rude or disrespectful</p> <p>6 conduct to customers or to other employees,</p> <p>7 correct?</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. And they prohibited insubordination or</p> <p>10 disrespectful conduct to members of management;</p> <p>11 isn't that right?</p> <p>12 A. Yes.</p> <p>13 Q. And they also prohibited violence or</p> <p>14 threats of violence; isn't that correct?</p> <p>15 A. Yes.</p> <p>16 Q. And you can understand, similar to</p> <p>17 your work at Food Giant, that it would -- that</p> <p>18 Sonic needs to ensure that its customers have --</p> <p>19 are treated respectfully and have a good</p> <p>20 experience while visiting the Sonic; isn't that</p> <p>21 right?</p> <p>22 A. Yes. I didn't deal with customers;</p> <p>23 but yes, I do agree with that.</p> <p>24 Q. All right. Now, you had mentioned</p> <p>25 earlier that during your second time that you</p>
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<p>1 MS. TAYLOR: Well, actually, I</p> <p>2 wouldn't -- I haven't eaten today at all,</p> <p>3 so I wouldn't mind taking just a quick</p> <p>4 30-minute break so I could just get a</p> <p>5 little bit of food. Is that all right with</p> <p>6 y'all?</p> <p>7 MR. STUTZMAN: Yeah. I'll hit the</p> <p>8 snack machine.</p> <p>9 MS. TAYLOR: Okay. Okay. That works</p> <p>10 for me.</p> <p>11 (Brief recess.)</p> <p>12 BY MS. TAYLOR:</p> <p>13 Q. Okay. So when we broke for lunch, we</p> <p>14 were talking about your training --</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. -- that you had related to your work</p> <p>17 at Sonic. And you said that you did some online</p> <p>18 training?</p> <p>19 A. Yes. It was some online training</p> <p>20 about the food temperatures and the rules and</p> <p>21 stuff.</p> <p>22 Q. Okay. And it also included your --</p> <p>23 the standards of conduct?</p> <p>24 A. I don't remember. But I do know that</p> <p>25 the paper I signed that said something about</p>	<p>1 worked at Sonic, that you had Alesha Gardner,</p> <p>2 who was the -- I guess that would be the general</p> <p>3 manager; is that correct?</p> <p>4 A. Yes. Correct.</p> <p>5 Q. And she's the individual who hired</p> <p>6 you, correct?</p> <p>7 A. Correct.</p> <p>8 Q. And then there was also Eric Ellis,</p> <p>9 who was an assistant manager; is that right?</p> <p>10 A. Correct.</p> <p>11 Q. And then you also said that there was</p> <p>12 a lady by the name of Tay Davis?</p> <p>13 A. Correct.</p> <p>14 Q. And were you aware that she was a</p> <p>15 manager on duty, meaning that she wasn't an</p> <p>16 assistant manager or a --</p> <p>17 A. Well, she was the --</p> <p>18 Q. -- general manager?</p> <p>19 A. Yeah. She wasn't the general manager</p> <p>20 but she was a manager.</p> <p>21 Q. Okay. If you had to describe the,</p> <p>22 kind of, hierarchy of management at the Sonic</p> <p>23 how would you describe it?</p> <p>24 A. Could you rephrase that?</p> <p>25 Q. Yeah. Like, would -- would Eric Ellis</p>

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1 have to report to Alesha Gardner?	1 Do something strange for a little -- and he'd
2 A. No.	2 also will say, I'll make you "holla for a
3 Q. So she would not supervise him as far	3 dolla." Stuff like that.
4 as what he does?	4 Q. And when did he say that?
5 A. No, ma'am.	5 A. He said stuff all the time. That's
6 Q. Okay. And would Tay Davis have to	6 the only inappropriate things he said. He would
7 report to Alesha Gardner?	7 sing, like, Keith Sweat songs, like -- but yeah,
8 A. She would.	8 he....
9 Q. And Alesha Gardner would oversee and	9 Q. How many times did he say, Do
10 supervise what she did?	10 something strange -- what did you say he said?
11 A. Yeah, she would.	11 A. Do something strange for a little
12 Q. And why don't you think that Eric	12 piece of change. He only said that once. And
13 Ellis reported to Alesha Gardner?	13 I'll make you "holla for a dolla," he only said
14 A. Because she told me in her own mouth,	14 that once. But he also sung, "Back that A up."
15 when I tried to tell her, that, This is my	15 Q. When did he tell you -- did he say
16 store. You'll never see the owner of this	16 that to you?
17 store, so I'm here. This my store. When I'm	17 A. Yes, ma'am. I backed up and looked at
18 not here Eric is in charge. Eric is my	18 the screen and he said -- that's when he said,
19 right-hand man.	19 "back that ass up." And when I -- I --
20 That's exactly what she told me.	20 Q. Let's first talk about do something
21 Q. Okay. When did she tell you that?	21 strange for a little piece of change. When did
22 A. I can't remember the exact -- I can't	22 he tell you that?
23 remember the exact date, but it was before the	23 A. It was -- it was before the incident.
24 incident happened. I tried to tell her about	24 Maybe two weeks before the incident.
25 Eric.	25 Q. And when you refer to the incident, is
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1 Q. So you're saying before the incident	1 that the one that you reported regarding --
2 happened you tried to tell her about Eric?	2 A. What he did.
3 A. Yes, ma'am.	3 Q. -- him coming up behind you as you
4 Q. What did you try to tell her?	4 were leaning over a trash can?
5 A. I told her I said, Eric be -- when I	5 A. Yes, ma'am.
6 work with Eric he touch -- and she was like --	6 Q. Okay. And tell me the circumstances
7 and she cut me off. She wasn't trying to hear	7 of him saying something along the lines of do
8 me.	8 something strange for a little piece of change.
9 Q. Okay. And what were you trying to	9 A. He would just blurt it out, you know.
10 tell her again?	10 He -- he sung a lot.
11 A. That he would touch my hand and sing	11 Q. Is that a song that he was singing?
12 songs to me.	12 A. I don't know about do something
13 Q. And what songs?	13 strange for a little piece of strange, but I'm
14 A. "Back that A up."	14 saying he -- he would sing a lot, and he would
15 Q. Does that mean back that ass up?	15 just say stuff.
16 A. Yes, ma'am.	16 Q. Well, what were the circumstances
17 Q. Okay.	17 surrounding him saying, Do something strange for
18 A. "Drop it like it's hot." He would	18 a little piece of change?
19 say, Do something strange for a little piece of	19 A. I don't know. He just -- that was --
20 change.	20 he just did it. I don't know.
21 Q. Excuse me?	21 Q. And are you saying that he said that
22 A. He'd say, Do something strange for a	22 to you?
23 little piece of change.	23 A. When he said it, I was beside him. He
24 Q. Okay. Is that a song he would sing?	24 was looking at me. He -- I don't know for a
25 A. He would say that. He would say that,	25 fact he was talking to me, but he was looking at

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1 me and he said it when I walked by him.	1 Q. And then you left Sonic December 31st
2 Q. And was anyone else around when he	2 of 2019. So that's --
3 said this?	3 A. They fired me December 31st.
4 A. Somebody was always around, but they	4 Q. So that's about, I guess, a --
5 didn't -- like, they didn't -- it was okay for	5 A. It was December 30th or 31st when they
6 them.	6 fired me.
7 Q. So who was around specifically when he	7 Q. Okay. And that's about a month and a
8 said do something strange for a little piece of	8 half that you worked there?
9 change?	9 A. Yes.
10 A. Tay was there. If I'm not mistaken, I	10 Q. Okay. And so when -- when was -- how
11 think Claudia was there.	11 soon into your employment there did he call you
12 Q. Did you ever have a conversation with	12 baby?
13 Tay or Claudia about him making that comment?	13 A. It was -- ooh, a -- probably about a
14 A. With Claudia.	14 week --
15 Q. When did you have that conversation?	15 Q. Okay.
16 A. It was that same day. And I was like,	16 A. Before that happened.
17 Why he do that? Why he -- and she said, I asked	17 Q. Before the trash can incident
18 him the same thing, and he said that he wouldn't	18 happened?
19 do it if he didn't like you. He didn't -- he	19 A. Yes.
20 wouldn't do it if -- not me, but just if he	20 Q. Okay. And you told him not to call
21 didn't like a person. He wouldn't do it if he	21 you that?
22 didn't like a person.	22 A. I did, yes.
23 Q. What did she mean by that, if you	23 Q. And when did he refer to you as Baby
24 know?	24 again?
25 A. I have no idea.	25 A. He was like, Excuse me, Baby.
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1 Q. Did you ever have a conversation with	1 Q. Excuse me?
2 Tay about that?	2 A. He said, Excuse me, Baby.
3 A. No, because -- no.	3 Q. Okay. Did you ever hear him refer to
4 Q. And what else did he say that you	4 other people as Baby?
5 thought was inappropriate?	5 A. I never heard him.
6 A. He called me Baby before. You're	6 Q. When was the last time that he called
7 talking about besides him singing the songs?	7 you Baby?
8 Q. Yes.	8 A. On that same day.
9 A. He called me Baby, and I asked him not	9 Q. What same day?
10 to do that.	10 A. The first time -- the first time he
11 Q. How many times did he call you Baby?	11 said Baby, he was like, Slow down, Baby, because
12 A. He did it twice after I -- the very	12 I was washing the dishes. And I asked him not
13 first time I asked him not to, he did it again.	13 to call me that. And the second time he was
14 Q. He did it one more time again?	14 like, Excuse me, Baby.
15 A. Just one more time, yes.	15 Q. Okay. And it was that same day --
16 Q. And was that -- so you were hired	16 A. Yes, ma'am.
17 November -- what was that? November 22nd; is	17 Q. -- that you asked him not to?
18 that right?	18 A. Yes.
19 A. No. I was --	19 Q. But he didn't call you Baby after
20 Q. Of 2019?	20 that?
21 A. 12.	21 A. No.
22 Q. November 12 --	22 Q. Okay. What other comments did he make
23 A. Yes.	23 that you thought were inappropriate?
24 Q. -- of 2019.	24 A. That's all I that can remember. The
25 A. Yes.	25 singing and -- that's all that I can remember is

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1 the singing and him saying that. And like, when 2 I passed him food, he'll try to, like -- you 3 know, you passing the food he'll do this 4 (indicating). You know, instead of just 5 grabbing it he would do like -- put his hand 6 over your hand like that (indicating).	1 and he'll say it out loud, you know. So he'll 2 be looking at me when he say it. I don't -- I'm 3 not sure if he was just talking to me, but he 4 would be looking directly at me when he say it. 5 Q. And were other people around when he 6 said that?
7 Q. Okay. So I just want to make sure the 8 record is clear because the court reporter is --	7 A. Yes, other people was around.
9 A. Okay.	8 Q. And who was around?
10 Q. -- taking it down. He would touch 11 your hand when --	9 A. I don't know. I just know that 10 everybody heard him -- everybody I worked with 11 been heard him sing and say stuff.
12 A. Yes.	12 Q. Okay. And -- but particularly when he 13 said make you holler for a dollar --
13 Q. -- you handed him food?	14 A. Uh-huh.
14 A. Being extra friendly, yes.	15 Q. -- was there anyone that was around 16 that heard that?
15 Q. What songs did he sing?	17 A. I know Claudia and Tay was around when 18 he was -- Alesha have been around when she....
16 A. It was "drop it like it's hot" and 17 "back that A up." And that "drop it like it's 18 hot," I don't know if that's a song or not, but 19 he used to say it.	19 Q. Who was around when he said make you 20 holler for a dollar?
20 Q. And when did he sing that?	21 A. I can't remember exactly who was 22 around. I just know -- I can't remember exactly 23 who I was working with that day.
21 A. He said that a lot. Make you "holla 22 for a dolla," he only said that that one time. 23 But he -- he said "back that A up" -- he used to sing that a lot.	24 Q. Now, when you were hired, you were 25 hired as a part-time employee; is that correct?
25 Q. And what do you mean "a lot"? How	
Page 115	Page 117
1 many times?	1 A. I was supposed to be -- start off --
2 A. I don't know. It just -- he would 3 just sing it, like -- I want to say every time I 4 worked with him, but I know it was more than 5 twice, more than three times. I would say more 6 than three times, I know.	2 she was going to start me off for -- between 30 3 and 35 hours. 25 to 35, something. She said 4 it'll be somewhere up in there before I go to 5 full-time. She said when I became an actual 6 manager, that's when I would be full-time.
7 Q. Would you say less than five?	7 Q. So during the time that you worked for 8 Sonic, you only worked about 20 hours a week; 9 isn't that right?
8 A. Less than five, yes, ma'am.	10 A. No. I worked more. 20 hours -- yeah. 11 Yes, ma'am. A week, yes.
9 Q. How many times did he say make you 10 holler for a dollar?	12 Q. That's correct.
11 A. I only heard him say it once.	13 What other comments did Eric Ellis 14 make?
12 Q. Say that again?	15 A. That's all I can remember.
13 A. I think he only said that once.	16 Q. Okay.
14 Q. And when did he say that?	17 A. You -- probably....
15 A. It was a couple of weeks before that 16 happened.	18 Q. And you mentioned earlier that you 19 spoke with Alesha Gardner about Eric Ellis?
17 Q. You mean the trash can situation?	20 A. Yes, ma'am.
18 A. Yes, ma'am.	21 Q. And when did you do that?
19 Q. Okay. And what were the circumstances 20 surrounding him saying that?	22 A. It was about two weeks before the 23 incident happening. It was after he was singing 24 a song and touched my hand.
21 A. Could you rephrase that?	25 Q. What song?
22 Q. Yeah. What -- where -- when he said 23 make you holler for a dollar, was he speaking to 24 you?	
25 A. All I know, he would be looking at me	

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1 A. "Back that A up"....	1 say or something.
2 Q. Did you ever tell him not to touch	2 She cut me off, and she was like, This
3 your hand?	3 is my store. When I'm not here, Eric in charge.
4 A. I really wanted to keep my job.	4 He my right-hand man. You'll never see the
5 That's why I went to Alesha. But Alesha told me	5 owner of this store. So therefore, this is my
6 that he was -- that -- I went to her first	6 store.
7 before I said anything to him. And she -- after	7 Q. Did you tell her that he touched your
8 she told me what she said, I was -- I didn't say	8 hand or did you not get it out?
9 anything, you know. I would get to the point	9 A. I didn't because Alesha was drunk -- I
10 where I'd try to hurry and just sit the food	10 didn't see her drinking, but I smelled the
11 down so he could just pick it up without having	11 alcohol. She -- she was -- it's hard to
12 to touch my hand but I didn't always pass the	12 explain, but she wasn't trying to hear me.
13 food, you know. He didn't do that all the time.	13 Q. And when did you speak to her?
14 It was just sometime whenever I was working, you	14 A. I told her about that two weeks before
15 know, bagging up the food he would do it.	15 that happened.
16 Q. About how many times did he touch your	16 Q. Did you speak to her by telephone, or
17 hand?	17 did y'all speak in person?
18 A. At least three.	18 A. In person. And Barbara seen when I
19 Q. And you never -- you never told him	19 called her and asked to speak to her a minute.
20 not to touch your hand; is that correct?	20 Q. Say that one more time?
21 A. Correct.	21 A. Barbara standing right there when I
22 Q. And you never told him not to sing the	22 said, Alesha, may I speak to you for a moment?
23 songs; is that correct?	23 Q. And who is Barbara?
24 A. Correct.	24 A. Barbara Crawford.
25 Q. When he made the comment, Make you	25 Q. Was Barbara Crawford -- was she also a
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1 holler for a dollar, you didn't tell him not to	1 cook?
2 say that; is that right?	2 A. Yes.
3 A. I just ignore him. No, I didn't.	3 Q. Did you get along with Barbara?
4 Q. And you didn't tell him not to say, Do	4 A. I didn't have no problems with
5 something strange for a little piece of change?	5 Barbara.
6 You didn't tell him not to say that either; is	6 Q. Do you think Barbara would say
7 that right?	7 anything untruthful about you?
8 A. Correct. I was just trying to ignore	8 A. I got along with everybody there till
9 him.	9 after that happened.
10 Q. But you did tell him not to call you	10 Q. Do you have any reason to believe that
11 Baby; is that correct?	11 Barbara would say anything untruthful about you?
12 A. Yes, ma'am.	12 A. I don't know. Everybody turned on me.
13 Q. And when you told him that, he did it	13 Q. Do you remember, when you spoke with
14 one more time but never did it again.	14 Alesha Gardner, was that -- well, what time of
15 A. Correct.	15 the day was it?
16 Q. And you said that you spoke with	16 A. I'm not sure. I don't know. I don't
17 Alesha Gardner about two weeks before --	17 know.
18 A. Correct.	18 Q. Was it during your shift when you
19 Q. -- the trash can incident?	19 spoke to her?
20 A. Correct.	20 A. Yes, it was during my shift.
21 Q. Okay. And tell me what you told her.	21 Q. What was the shift that you worked?
22 A. I told her, I said, When I work with	22 A. It was 5:00 to 9:00 or 5:00 to 10:00,
23 Eric, he touch -- and she was like, Let me stop	23 starting off, until I became manager.
24 you -- she said, Let me tell you: This my	24 Q. So you were working after -- after
25 store -- it's like she knew what I was fixing to	25 5:00 until close?

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<p>1 A. Well, I wasn't supposed to close until 2 January. But one night Tay asked me to help 3 close because somebody didn't come in. So I was 4 like, Sure, I'll help you. So I helped her 5 close that night.</p> <p>6 And the night the incident happened 7 she said my schedule -- Eric changed it so I 8 could work with him because she told him how 9 well I did holding down the kitchen by myself, 10 and said he didn't believe it, so he wanted to 11 see for himself, so he put it so I could work -- 12 close with him that night.</p> <p>13 Q. Okay. But typically you would work 14 from 5:00 till 10:00?</p> <p>15 A. 5:00 to 9:00 or 5:00 to 10:00.</p> <p>16 Q. What time does Sonic close at night?</p> <p>17 A. 10:00 through the week, I think, and 18 11:00 on the weekend.</p> <p>19 Q. Did you speak with anyone else about 20 your concerns about Eric?</p> <p>21 A. No.</p> <p>22 Q. Do you have anything in writing about 23 your conversation with Alesha Gardner a couple 24 of weeks before the trash can incident?</p> <p>25 A. No, I didn't write it down because I</p>	<p>1 A. She didn't care. She drunk a lot. 2 She was -- I never seen her drinking. I'm not 3 going to -- but I smelled it on her. I've seen 4 cans in the garbage can. I've....</p> <p>5 Q. Did you see her -- you never saw her 6 drink?</p> <p>7 A. I never saw her. I just -- it was 8 loud on her.</p> <p>9 Q. And how many times did you see cans in 10 the garbage can?</p> <p>11 A. I only seen cans once. When Claudia 12 and Barbara was emptying the garbage can, they 13 said, This don't make sense at all. Pitiful. 14 That's they word.</p> <p>15 Q. And how many cans were in the garbage?</p> <p>16 A. I seen two.</p> <p>17 Q. And how many times did you smell 18 alcohol on Alesha?</p> <p>19 A. A lot. Like, I don't remember -- I 20 remember one time when I didn't smell it and 21 that's when I got hired. Other than that it was 22 on her.</p> <p>23 Q. Did you smell alcohol on anyone else?</p> <p>24 A. Eric, but his wasn't as loud as 25 Alesha.</p>
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<p>1 I didn't think it'll get to this, you know. I 2 never wrote that down.</p> <p>3 Q. Okay. Did you ever complain to Alesha 4 Gardner about anything else while you were 5 working at Sonic?</p> <p>6 A. No. I remember one night that I was 7 in tears just because of how she would drink, 8 and I was trying to learn and stuff. And I told 9 her that -- I talked to her, and she -- she 10 said, It's going to be -- I never said anything 11 about her drinking specifically. But I was 12 like, I just feel uncomfortable here. And she 13 was like, It's going to be all right.</p> <p>14 It was another manager there that 15 night from Columbus. She saw me crying.</p> <p>16 Q. And what was the other manager's name?</p> <p>17 A. I'm not sure because she was just 18 filling in for Eric at that time because he was 19 on vacation or something. So I'm not sure what 20 her name is. I just know she was from Columbus.</p> <p>21 Q. And when did you -- when did you cry 22 and tell her -- what did you tell her?</p> <p>23 A. I just told her that I was 24 uncomfortable here.</p> <p>25 Q. Okay. Did she ask you why?</p>	<p>1 Q. And how many times did you smell 2 alcohol on Eric's breath?</p> <p>3 A. Only twice on him.</p> <p>4 Q. How many times did you work with Eric?</p> <p>5 A. I don't -- I don't know. I don't 6 know. I know it was more than five times, but I 7 don't know. That's me -- him being there while 8 I was there, because he changed my schedule to 9 his shift, to work with him, the day shift. And 10 I talked to Alesha about it and she changed it 11 back to the night shift.</p> <p>12 Q. Okay. So who worked the night shift?</p> <p>13 A. The managers will take turns, but on 14 -- and see, that week that he changed it, he was 15 on days, so -- he was on days that week. And I 16 came to her and asked her why my schedule was 17 changed, you know, because she -- we had already 18 agreed that I work from 5:00 to either 9:00 or 19 5:00 to closing until I actually became a 20 manager, you know.</p> <p>21 Q. Okay. And so how -- when your 22 schedule -- well, when was your schedule 23 switched to days?</p> <p>24 A. It was a few weeks before that 25 happened. It was a few weeks before that</p>

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1 happened. I don't know exactly when. I don't	1 A. No.	
2 know exactly when, but I know he change -- they	2 Q. Do you have any reason to believe that	
3 -- he changed it to his shift.	3 Mike Hill would say anything untruthful about	
4 Q. Was it -- was it before the trash can	4 you?	
5 incident or after the trash can incident?	5 A. I don't see why he would because --	
6 A. It was before it.	6 Q. What's Jordan's last name?	
7 Q. Okay. And how many weeks before, if	7 A. I don't know Jordan's last name.	
8 you know?	8 Q. Does Jordan Atkinson sound correct?	
9 A. I want to say it was, like, two, maybe	9 A. I really -- even when I went to the	
10 -- I'm not really sure.	10 police station, I told them I don't know -- I	
11 Q. Were you switched back to the nights?	11 don't know her last name.	
12 A. Yes.	12 Q. Okay. And did you get along with	
13 Q. Did you ever make any other complaints	13 Jordan?	
14 about anything at work to Alesha or to anyone	14 A. I didn't really know her like that.	
15 else?	15 It's like we worked together, you know. But we	
16 A. Not that I can remember.	16 didn't have any problems.	
17 Q. Do you have any other complaints about	17 Q. You didn't have any issues with her?	
18 your work at Sonic?	18 A. No.	
19 A. Everything was fine until after that	19 Q. Do you have any reason to believe that	
20 happened.	20 she would say anything untruthful about you?	
21 Q. When did you -- because you said	21 A. No.	
22 earlier that you were crying at work one day and	22 Q. And Claudia is your aunt?	
23 told Alesha that --	23 A. No, ma'am. She's Tay's auntie. I	
24 A. I mean, yes, that. I'm saying, like,	24 don't know her last name.	
25 I don't -- besides that? What I mean by I don't	25 Q. And did you know Claudia before you	
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1 have anymore complaints, he was -- I already	1 worked at Sonic?	
2 discussed the fact that he was, you know,	2 A. No, ma'am.	
3 touching my hand and singing songs and stuff. I	3 Q. And did you get along with Claudia?	
4 didn't have -- what I mean by that is I didn't	4 A. Yes, ma'am.	
5 have any problems with Tay. I didn't have any	5 Q. And do you have any reason to believe	
6 major problem with Alesha besides, you know, I	6 that she would say anything untruthful about	
7 tried to tell her and she wasn't trying to hear	7 you?	
8 me, and when I was crying at work I told her I	8 A. No, ma'am.	
9 felt uncomfortable. But other than that, there	9 Q. What about the carhops who worked --	
10 was nothing -- there was nothing else that I can	10 or I guess they're servers. Do you call them	
11 remember.	11 servers or carhops?	
12 Q. Okay. So let's talk about kind of the	12 A. Carhops.	
13 other employees that you worked with. Who all	13 Q. Carhops? Who were the carhops who	
14 did you work with in the kitchen?	14 worked with you?	
15 A. Barbara, Jordan, Mike, and Claudia;	15 A. One of them was one they called Twin.	
16 and a new guy had came, but I only worked with	16 I don't know her real name. But she's from	
17 him once or twice.	17 Aberdeen. She's young, like she -- I think her	
18 Q. And what's Mike's last name?	18 last name is Thomas, but I don't know -- well,	
19 A. I want to say his last name was Hill.	19 her -- she -- her mother is a Thomas. I know of	
20 Yeah, it was Hill.	20 her mother, but I don't know her, you know.	
21 Q. And did you get along with Mike Hill?	21 When I stayed at 307 Hardy Street, they stayed	
22 A. I didn't have -- he never said	22 at 307 Hardy. That was years ago.	
23 anything to me, you know.	23 Q. Okay. Any other carhops that worked	
24 Q. So you didn't have any problems with	24 with you when you worked there?	
25 him?	25 A. Yes, it was. I don't know her name,	

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1 but it was -- I really didn't know them like 2 that. It was another girl named -- that night 3 she was yelling. She was meddling with them, 4 like, picking at me. What's her name? I forgot 5 her name. I forgot her name. 6 It was another carhop, a new girl 7 named Christina or something.	1 you see what he did? And she was like, Girl, 2 yes. And I told her I said, I'm fixing to go. 3 And she was like, Don't leave. I said, No, I'm 4 not staying here. I'm fixing to go. And she 5 said, Don't leave me because he did the -- she 6 said, I'm going to be back here with him by 7 myself, and he did the same thing to me.
8 Q. And you're saying that she yelled at 9 you?	8 Q. And that was Jordan?
10 A. Huh-uh. It was -- what is her name? 11 I don't know her name. I forgot her name.	9 A. Yes, ma'am.
12 Q. Any other carhops that you can recall?	10 Q. Okay. So let's go back to the
13 A. Alexius Ellis. Yeah.	11 incident. Did you see where Eric was before you 12 leaned over the trash can? Did you know where 13 he was in the store?
14 Q. Say that again.	14 A. I wasn't really paying attention. I 15 was just cleaning. And I noticed the bag fell 16 down and I pulled the -- I got the bread off the 17 top of the garbage and was putting inside the -- 18 inside the bag. And I was fixing to pull it up, 19 you know. It happened so fast, you know. And I 20 was, like, in shock for, like, a few seconds.
15 A. Alexius Ellis.	21 Q. Now explain to me what -- you said 22 that you felt stroking?
16 Q. Okay. She was another carhop?	23 A. It was like a stroke and a grind, 24 like.
17 A. Yes.	25 Q. What do you mean by a stroke and a
18 Q. And is she related to Eric Ellis?	
19 A. That's his daughter.	
20 Q. How old was Alexius, if you know?	
21 A. I don't know how old she was.	
22 Q. Do you know if she had graduated from 23 school yet?	
24 A. Yes, she had graduated from school.	
25 Q. Do you know how long she had worked at	
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1 Sonic?	1 grind?
2 A. She was there before I started.	2 A. It felt like he was humping me and 3 moving, like.
3 Q. And did you get along with Alexius?	4 Q. How long did it last?
4 A. Yes.	5 A. It didn't last long at all.
5 Q. Any other carhops that you can think 6 of?	6 Q. Would it have lasted a second?
7 A. I can't remember. I cannot remember.	7 A. It was longer than a second.
8 Q. Okay. Tell me what happened the night 9 that you claim that Eric Ellis was inappropriate 10 with you when you leaned over a trash can. Tell 11 me, where were you and what -- what time of the 12 night was that?	8 Q. Was it longer than two seconds?
13 A. It was around 7:00-something. I was 14 just got done with -- work had got slow, and so 15 I started cleaning my work area. And I noticed 16 that the trash bag fell down into the can, into 17 the trash can. So I bent over to pull the trash 18 can -- the trash bag out the -- up over the 19 trash can, and I felt grinding stroke feeling 20 behind me. And I looked to the side and all I 21 seen was that big grin on his face.	9 A. I would say maybe -- maybe three 10 seconds.
22 A. And I looked and I seen -- I seen 23 Jordan was looking, but I didn't know if she 24 actually seen what he did. So after he did it, he went outside. And I asked her I said, Did	11 Q. And did he say anything as he moved 12 by? Did he say, Excuse me, or make any comment?
	13 A. He say, Excuse me. But he had a big 14 grin on his face.
	15 And Jordan was like, I know he tried 16 to do it because all of that space, he could 17 have went around you, and he did me like that.
	18 That's why she don't like working with 19 him by herself.
	20 Q. Now, the area between, I guess, you 21 and the trash can, was there a walkway by the 22 trash can?
	23 A. It was, like, a walkway; but it was 24 also another space. It was, like, a deep space 25 where he could have went out. He had plenty of

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<p>1 space to walk out instead of, you know --</p> <p>2 Q. How wide was the space that he had to</p> <p>3 walk through?</p> <p>4 A. I would say about -- that area was</p> <p>5 probably about an aisle and a half, an aisle,</p> <p>6 because the garbage can was pushed back, and I</p> <p>7 was bent over -- he had space. I don't know</p> <p>8 exactly how many space. I don't know exactly.</p> <p>9 But I know it was plenty of space. If you see</p> <p>10 it, you'll know exactly what I'm talking about.</p> <p>11 Q. Was -- was it as wide as this table?</p> <p>12 A. It was wider than this table.</p> <p>13 Q. Okay. So this table -- what do you</p> <p>14 think? Do you think this table is three feet</p> <p>15 wide?</p> <p>16 A. You talking about across like this?</p> <p>17 Q. That's correct?</p> <p>18 A. Yes, it's -- it's wider than this</p> <p>19 table.</p> <p>20 Q. How wide -- how much wider?</p> <p>21 A. Maybe a few extra inches wider.</p> <p>22 Q. So maybe a little bit more than three</p> <p>23 feet?</p> <p>24 A. Yes.</p> <p>25 Q. Okay.</p>	<p>1 "he did the same thing to me"?</p> <p>2 A. I didn't.</p> <p>3 Q. And what did she say?</p> <p>4 A. I -- I didn't ask her.</p> <p>5 Q. Oh, you did not ask her. Okay.</p> <p>6 Was there anyone else in the Sonic or</p> <p>7 in the cooking area?</p> <p>8 A. The car -- at that time the carhops</p> <p>9 had took an order outside. It was just me,</p> <p>10 Jordan, and Eric.</p> <p>11 Q. Okay. So when Jordan told you you</p> <p>12 needed to stay or asked you to stay, did you</p> <p>13 stay?</p> <p>14 A. Yes, ma'am. I told her that I would</p> <p>15 stay as long as I could, but I was going to have</p> <p>16 to leave because I'll be left with him by</p> <p>17 myself, and I couldn't take -- I wouldn't be</p> <p>18 able to, you know, take no break. He was, like,</p> <p>19 no, he -- you know, I didn't want to be -- I</p> <p>20 didn't want her to be there by herself, but I</p> <p>21 felt like I needed to go get some help, so....</p> <p>22 Q. And why did you feel like you needed</p> <p>23 to go get some help?</p> <p>24 A. I needed to get somebody -- because of</p> <p>25 what he did to me. I felt violated, like -- it</p>
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<p>1 A. Because the garbage can was, like, in</p> <p>2 a dip, like, you know. And so I'm up over the</p> <p>3 garbage, you know. So he had space to go around</p> <p>4 me.</p> <p>5 Q. Okay. Did you say anything?</p> <p>6 A. I was shocked. He went outside after</p> <p>7 that, but I was shocked for a few seconds.</p> <p>8 Like, right after that he went outside and --</p> <p>9 Q. So you did not say anything?</p> <p>10 A. No.</p> <p>11 Q. Okay. And did he have anything in his</p> <p>12 hands as he walked by you with the trash can?</p> <p>13 A. No. He reached up but he didn't grab</p> <p>14 nothing because it was, like, some -- some cups</p> <p>15 and stuff. He didn't grab nothing. He reached</p> <p>16 up like he might have been grabbing at something</p> <p>17 and walked on outside.</p> <p>18 Q. And what -- tell me exactly what</p> <p>19 Jordan told you.</p> <p>20 A. She told me, she was like, Don't leave</p> <p>21 me. And I said, I'm fixing to go. And she was</p> <p>22 like, Don't leave me because I'm going to be</p> <p>23 back here with him myself and he did the same</p> <p>24 thing to me.</p> <p>25 Q. And did you ask her what she meant by</p>	<p>1 wasn't right.</p> <p>2 Q. Now, is there any -- do you think that</p> <p>3 there is any possibility that Eric was trying to</p> <p>4 pass by you as you leaned over the trash can and</p> <p>5 bumped against you?</p> <p>6 A. I raise my --</p> <p>7 MR. STUTZMAN: Object to the form.</p> <p>8 You can answer.</p> <p>9 A. I raise my right hand to God that I'm</p> <p>10 a hundred percent sure that he did that</p> <p>11 intentionally.</p> <p>12 BY MS. TAYLOR:</p> <p>13 Q. Did you ever ask him why he did that</p> <p>14 or if he did that?</p> <p>15 A. I was, like, shocked. Right after he</p> <p>16 did that he went outside. And I was shocked</p> <p>17 that he did that, like -- because he did the</p> <p>18 little other stuff but....</p> <p>19 Q. And so you did not ask him?</p> <p>20 A. No, I didn't.</p> <p>21 Q. How long did you stay after that</p> <p>22 exchange?</p> <p>23 A. That happened at 7:00-something. She</p> <p>24 get off at -- she was going to get off at 9:00</p> <p>25 that night. I was going to have to close with</p>

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1 him. I didn't want to close with him. So I 2 left at like 8:30-something. 3 Q. Was Jordan still there when you left? 4 A. Yes. 5 Q. Did you say anything to her about 6 leaving for the night? 7 A. I told her that I was going to stay as 8 long as I could, but I didn't -- I was like, 9 It's no way I'm closing with him. 10 Q. Did you clock out before you left? 11 A. Yes. I think I did. Yes, I did 12 because -- I'm a hundred percent sure I clocked 13 out. 14 Q. And did you say anything to Eric 15 before you left? 16 A. I told -- I asked him, I was like, 17 Could I take a break? 18 Q. And what did he say? 19 A. He say, Yeah, sure. Go ahead. 20 Q. And what did you do when you took a 21 break? 22 A. I went -- I called my husband to come 23 get me. And when I got home, I called -- I told 24 my husband what happened, and I called the 25 police.	1 different. She been married her whole life. 2 And oh, yeah, he also asked me, Why 3 you got to check up on your husband at night? 4 He was like, You always got to call and check up 5 on your husband. That night he said that to me. 6 Q. Okay. And would you call your husband 7 while you were on the clock? 8 A. Yes. He would -- he would -- he 9 didn't care. He told me, I don't care about you 10 -- you know, you can make phone calls, because 11 everybody else had their phone out. Just 12 because they do it, I'm not going to come in and 13 do what they do. So I asked for permission: 14 May I use my phone? 15 Q. Okay. Okay. And so he said, Why do 16 you have to call your husband to check in? 17 A. Why you always got to call and check 18 in with your husband? 19 Q. And you said that someone -- was Craig 20 a customer? 21 A. No. 22 Q. Who was he? 23 A. He would come up there to -- he came 24 up there to Sonic to -- his name is Craig 25 Gardner. He would come up there to, I guess,
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1 Q. And what did you tell your husband? 2 A. That I leaned over to pull the garbage 3 bag out the trash can and he came behind me and 4 he humped me. 5 Q. And what did your husband say? 6 A. He was more -- he was -- he was 7 shocked. He said that every time I drop you 8 off, he always watching. He's always looking. 9 Q. Could you repeat that? 10 A. Every time I drop you off and come -- 11 every time I drop you off and come pick you up, 12 he's looking. If he's there, he was always 13 looking. 14 Q. Looking at the car? 15 A. He was just -- I don't know what he 16 meant. He just said he was always looking. 17 Oh, I forgot. Eric also said to a guy 18 named Craig -- because people off the street 19 would come into Sonic and, like, they'll fix 20 them something to eat or something. But Craig 21 never fixed him something to eat. They will fix 22 Craig food for him. 23 And Craig -- he told Craig, She been 24 married 20 years. And Craig say, That's a good 25 thing, Baby. Don't let nobody tell you	1 visit or something. They'll fix him sandwiches 2 and stuff. 3 Like, people would come there and fix 4 them something to eat at Sonic that didn't even 5 work there. 6 Q. So did -- did Craig -- was he related 7 to Alesha? 8 A. That I don't know. 9 Q. And would he pay for the food? Was he 10 a customer? 11 A. No. 12 Q. Would he -- would he go in the kitchen 13 and make his own food? 14 A. No. He never made his own food. 15 Like, they would fix him something to eat. 16 Q. Okay. 17 A. That night no one fixed him anything. 18 Like, he didn't get nothing to eat. But he was 19 just talking, came up there talking that night. 20 But usually, like, when Tay there, Tay fix him 21 something to eat. 22 Q. Okay. And when did you call the 23 police? 24 A. Right after I got home. I told my 25 husband about it, and I was like -- I started

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<p>1 crying. And I -- I grabbed the phone. And I 2 was like, I hate Jordan -- you know, she's still 3 up there with him because I got two girls at 4 home, and I did not want to leave her up there. 5 But I had to because I wanted to get her some 6 help. I wanted -- so she wouldn't be up there 7 -- even though she was going to get off at 9:00, 8 it would have stopped it, you know.</p> <p>9 Q. Ms. Haughton, would you like to take a 10 couple of minutes?</p> <p>11 A. I'm okay. I'm getting sleepy. I just 12 want to get it over with. I'm fine.</p> <p>13 THE WITNESS: Thank you.</p> <p>14 BY MS. TAYLOR:</p> <p>15 Q. Ms. Haughton, have you ever seen him 16 do that to Jordan?</p> <p>17 A. I never saw him do that.</p> <p>18 Q. Had you ever seen him do that to 19 anyone else?</p> <p>20 A. No, ma'am.</p> <p>21 Q. Had you ever seen him pass behind 22 employees or scoot by employees back in the 23 kitchen while --</p> <p>24 A. Yeah, because --</p> <p>25 Q. -- people were working?</p>	<p>1 A. No, I didn't.</p> <p>2 Q. And who was the female? You said you 3 spoke with Chaz Thomas and a female?</p> <p>4 A. I don't know her name.</p> <p>5 Q. And did you know Chaz Thomas before 6 you called the police?</p> <p>7 A. No. It just I seen his name on the 8 report. That's how I learned his name.</p> <p>9 Q. Okay. Okay. And what did you tell 10 Chaz?</p> <p>11 A. I told Chaz and the police lady what 12 happened, by him humping me.</p> <p>13 Q. And you did that at the police 14 department? You went to the police department 15 to do that.</p> <p>16 A. I called -- I called them out, and 17 then they asked me did I want to press charges 18 tonight. And I said, Yes, ma'am and yes, sir. 19 So they was like, Okay.</p> <p>20 So me and my husband left, and I went 21 to the police station. And the time I walked 22 through the door, she said, You the one called? 23 I said, I figure -- she said -- I said, Yes. 24 And she was like, I figure what job you was 25 talking about when you called, because I still</p>
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<p>1 A. Where we cook the meat, that part is 2 crowded. I could have understood if he had've 3 bumped into me or something at that part. But 4 where we were, it was enough space for him to go 5 around, and that was not an accident. I could 6 feel it and tell.</p> <p>7 Q. Who did you speak to at the police 8 department?</p> <p>9 A. I called the police department, and 10 they came out. And it was a guy, Chaz Thomas, 11 and some female. And they asked me did I want 12 to press charges tonight. And I said, Yes, 13 ma'am, and yes, sir. And so I went to the 14 police station.</p> <p>15 When I walked through the door, this 16 lady said, I figured, when you called, what job 17 you was talking about. I had my uniform on. 18 Her name is -- she was the dispatch. Her name 19 is Sierra.</p> <p>20 Q. And what did she tell you?</p> <p>21 A. She said, I figured -- when you 22 called, I figured what job you was talking 23 about.</p> <p>24 Q. And did you ask her what she meant by 25 that?</p>	<p>1 had my uniform on.</p> <p>2 MS. TAYLOR: Go ahead and mark this as 3 the next exhibit number.</p> <p>4</p> <p>5 - - - - -</p> <p>6 (Exhibit Number 11 marked.)</p> <p>7 BY MS. TAYLOR:</p> <p>8 Q. And, Ms. Haughton, is that your 9 signature on the bottom of that document?</p> <p>10 A. Yes, it is.</p> <p>11 Q. Okay. And is that your handwriting on 12 the document?</p> <p>13 A. Yes, it is.</p> <p>14 Q. Okay. And so what you reported to the 15 police was that the garbage bag fell over inside 16 the garbage?</p> <p>17 A. The garbage bag fell down inside the 18 garbage.</p> <p>19 Q. And that that you bent over to pull 20 the bag up, and Eric came behind me and humped 21 me, and then he said, Excuse me.</p> <p>22 A. Yes.</p> <p>23 Q. Okay.</p> <p>24 A. Yes. But he had a big smile on his 25 face.</p>

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<p>1 Q. But you didn't include that in your 2 statement to the police? Was that correct? 3 A. That he had a big smile on his face? 4 No, I didn't write that he had a big smile on 5 his face. I was just trying to -- I didn't say 6 he had a big smile on his face, but he did. I 7 was just trying to get to the main point. 8 Q. And you said that your co-worker 9 Jordan was looking and that she said that she 10 had seen what he did? 11 A. Yes. She said that she saw what he 12 did. 13 Q. And she said that she didn't want to 14 be left alone -- 15 A. Correct. 16 Q. -- with him and that he had done that 17 to her before? 18 A. Correct. 19 Q. And that she gave you her Facebook 20 name? 21 A. Yes. 22 Q. And that's the information that you 23 included in your statement to the police; isn't 24 that right? 25 A. Correct. She told me that her</p>	<p>1 with Mr. Ellis? 2 A. They said that they would. 3 Q. Okay. Did they tell you when they 4 were going to do that? 5 A. No. 6 Q. After you got back home that night, 7 what was the next thing that happened? 8 A. Alesha called me, and she asked me why 9 did I tell on him. She said the police came and 10 arrested him. And I told -- she -- I said that 11 -- I told her what he did. And I told her, I 12 even have a witness. 13 I never told her the name of my 14 witness. She was like, Who is it? Who is your 15 witness? I knew eventually she would probably 16 figure it out because me -- we was the ones in 17 the kitchen. But I didn't tell her. 18 So she was like, He been here 19 such-and-such amount of years. It -- I think 20 she -- if I'm not mistaken, it was either seven 21 or nine years she said. He been here that many 22 years and you come and you told on him. You had 23 him arrested. 24 I'm going to call the camera man. The 25 camera man -- I called the camera man. That's</p>
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<p>1 Facebook name wasn't Jordan and that it was 2 J Marie. She wrote it on paper. That's how I 3 was able to.... 4 Q. Okay. And you did not include in your 5 statement that he had touched your hand before; 6 isn't that right? 7 A. No; I didn't. I was just trying to -- 8 that night I was just trying to get to -- I was 9 in shock still. You know, my mind was -- I 10 don't know. 11 Q. And after you -- and you did this at 12 the police department; is that correct? 13 A. Yes, ma'am. 14 Q. And after you made the complaint, what 15 was the next thing you did? 16 A. I went home. 17 Q. And what time was it when you went 18 home? 19 A. I'm not really sure what time it was 20 when I got home. 21 Q. And did you know what the police were 22 going to do with your complaint? 23 A. No. 24 Q. Did they tell you what they planned to 25 do or that they planned to go to Sonic or speak</p>	<p>1 what she said. I called the camera man. He's 2 on his way. And I said, That's good. You could 3 look at the camera, you'll see I'm telling the 4 truth that he did that. 5 And she was all, Yeah, he on his way. 6 I'm going to see. Why you stay -- when he did 7 that, why you stay long as you did? 8 And I was like, Because I didn't want 9 -- the other person, I didn't want to leave them 10 by theirself with him. 11 And so she was like, Well, the camera 12 man on his way. And she was like, I don't 13 believe he did that. 14 And I said, Ma'am, I said, God don't 15 like ugly. I wouldn't try to blemish somebody, 16 you know, just make something like that up. 17 And she was like, God don't like 18 pretty either. And I asked her what she meant 19 by that. She said, That's something I always 20 say. But like I said, the camera man on his 21 way. 22 She hung on me. 23 Q. What did she say? God don't like 24 what? 25 A. Pretty either.</p>

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1 Q. Okay. Did she say anything else?	1 was the next thing that you did?
2 A. No.	2 A. After she said that, after her
3 Q. Did you say anything?	3 response, I called corporate because I knew she
4 A. No, ma'am. I just told her what	4 was -- she was mad, so I....
5 happened, you know. She asked what happened,	5 Q. And when did you call corporate?
6 and I told her what happened. And she was like,	6 A. I googled their number, and I called
7 I don't believe he did that.	7 them that same night, I think.
8 Q. Did she tell you that she was going to	8 Q. You called them the evening of the
9 conduct an investigation and speak with	9 22nd?
10 witnesses?	10 A. That -- the night after she called me,
11 A. No, ma'am. She was mad.	11 I end up calling corporate.
12 Q. What was the next thing that you did?	12 Q. So you called corporate the night
13 A. My husband listened to the call, and	13 that --
14 he was like, What in the world? You know, What	14 A. Yes.
15 kind of stuff is that, you know?	15 Q. -- the incident happened?
16 Q. How long did the call last?	16 A. After her reaction, and I seen she
17 A. I wrote it down. I wrote it down in	17 wasn't -- well, she had already told me. But I,
18 my journal. I can't remember off the top	18 you know, still explained to her, you know, what
19 because I didn't -- but I wrote it down, you	19 he did and tried to tell her I wouldn't do
20 know, how long the call --	20 nobody like that, you know. But she was mad.
21 Q. Do you keep a journal?	21 She said I shouldn't have told on him. So
22 A. I was keeping a journal, but I stopped	22 that's why I called corporate.
23 writing because -- I kept a journal -- I started	23 Q. Okay. And were you able to reach
24 writing after that happened. I started writing	24 anybody?
25 after that happened. And I thought it'll make	25 A. I called the wrong corporate. I
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1 me feel better, but it actually made me feel	1 called some -- somebody in Ohio or something.
2 worse, so I just stopped writing. I stopped --	2 That's the corporate I called. But then I later
3 like, in middle -- the middle of January, I just	3 found out -- the one in Columbus. I was
4 stopped writing. It was like I kept reliving	4 googling till I found the one in -- but I think
5 it.	5 that one I called -- it might have been the next
6 Q. Why would you think that it would make	6 day or -- I'm not sure, but it wasn't long
7 you feel better?	7 after.
8 A. Just -- just getting it off my chest	8 Q. And who did you speak with at
9 instead of holding it in and just writing it	9 corporate?
10 out. You know, me being a writer, I thought it	10 A. Anita Howard.
11 would make me feel better, but it -- it didn't.	11 Q. And what did you tell her?
12 Q. And have you produced a copy of your	12 A. I told her what happened. And she
13 journal in this litigation?	13 said -- she said, Let me ask you something. And
14 A. I did.	14 I said, Yes, ma'am. And she said, Have you ever
15 Q. And did you write in the journal every	15 smelled alcohol on Alesha's breath? And I said,
16 day, or did you go back and write it based on	16 Yes, ma'am. I said, I smelled it on Eric
17 your recollection?	17 breath. But I'm going to be honest. It don't
18 A. No. I wrote -- like, say, sometimes I	18 be -- Eric don't be as loud as Alesha. I only
19 will write, like, that night; after the day,	19 smell it on -- you know, I smell it on Alesha's
20 that night. Sometimes I will write right then.	20 breath all the time.
21 Most of the time I would write -- sometime I	21 You know, I just told her.
22 will wake up and be like, I feel better, you	22 Q. So you're saying when you spoke with
23 know. I was -- a lot of -- some of it was about	23 Ms. Howard --
24 my feelings, how I felt, you know.	24 A. Anita.
25 Q. Now, after speaking with Alesha, what	25 Q. -- she asked you if you smelled

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1 alcohol on Alesha's breath?	1 that.
2 A. Yes, ma'am. She asked me have I ever	2 Q. And did you get her last name?
3 smelled alcohol on Alesha, because I was telling	3 A. No, ma'am.
4 her about Eric, and she asked me about Alesha.	4 Q. And she was in Columbus?
5 Q. What did you tell her about Eric?	5 A. Yes, ma'am.
6 A. That I smelled a little alcohol on him	6 Q. And what did you tell her?
7 that night. It wasn't loud, but I smelled a	7 A. What did I tell her? I told her -- I
8 little alcohol that night.	8 can't remember.
9 Q. What else did you tell her?	9 Q. Why did you call back a second time?
10 A. I told her what happened, and I -- I	10 A. I think I called after they -- after
11 told her what happened, and she told me years	11 Tay and Alexius Ellis tried to fight me, I
12 ago that wasn't even considered sexual	12 called. I think I called -- if I'm not
13 harassment.	13 mistaken, I think I called then because I --
14 Q. Now, did she tell you that --	14 yes, I did, because I went to the police station
15 A. She said she going to focus on Eric.	15 to press charges on them, and the -- I didn't
16 She wasn't going to focus on Alesha. Her focus	16 know their address or none of that. So the
17 was on Eric. And I was thinking, What's the	17 police said it probably will be best if you go
18 point of even asking me about -- I didn't tell	18 through corporate.
19 her, but I was like, Why she even ask about the	19 Q. And that would have been -- would that
20 alcohol on her breath?	20 have been on the 30th or 31st of January -- I
21 Q. So when she told you that years ago	21 mean of December?
22 that that wouldn't be considered sexual	22 A. Yes. December, yes, ma'am.
23 harassment, did she tell you that there weren't	23 Q. Okay. And the second time you called
24 laws that would protect women against sexual	24 you spoke with Cynthia?
25 harassment in the workplace years ago?	25 A. The second time I called -- I don't
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1 A. I didn't even know that it wasn't	1 know who I spoke to the second time. I really
2 considered sexual -- I didn't know anything	2 can't remember -- I don't -- I think it was
3 about it till she told me.	3 Cindy, Cynthia, or something, but I only spoke
4 Q. Okay. And did she tell you that they	4 with Anita once. Cindy or Cynthia or something
5 were going to investigate and look into it?	5 like that, her name.
6 A. She did say that. She did.	6 Q. Okay. And what did you tell Cynthia?
7 Q. And did she tell you that that would	7 You said you don't remember?
8 be inappropriate and that it would be against	8 A. I told -- them, well, about them
9 the policy of the company?	9 trying to jump on me.
10 A. That's what she said.	10 Q. And what did Cynthia say?
11 Q. And did she also tell you that the --	11 A. I think that's when she told me that
12 -- the owner of the company or the president of	12 the guy was out of town or something and he
13 the company was out of town and wouldn't be back	13 would call when -- but he ended up calling,
14 until after the holidays?	14 though, and he said that he would get back in
15 A. That was the second time I called.	15 touch with me after the holidays. But he
16 Q. And she did tell you that?	16 didn't. And I was calling, but they never
17 A. Yes. And he end up calling. He did	17 called me. And when I called I couldn't get in
18 end up calling. My husband had the phone. He	18 touch with anyone anymore.
19 the one that said that he would call back, but	19 Q. And did he try to call you before or
20 he never called back.	20 after the altercation at Sonic?
21 Q. How many times did you speak with	21 A. It was after the altercation. He said
22 Nita, or Ms. Howard?	22 he was -- he left a message with my husband that
23 A. I spoke to her only once. The other	23 he was just calling to let me know that he was
24 one was named Cynthia that I was speaking to.	24 going out of town and that he would contact me
25 Cindy. It was Cindy or Cynthia, something like	25 after the holidays. He was just letting me know

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1 that.	1 tell on him. And when she said it, she was
2 Q. So that would have been after the 30th	2 rolling her eyes at me that night.
3 or 31st of December?	3 I didn't care about none of that. I
4 A. I want to say it was -- it had -- it	4 didn't care. I just did -- I was there to work.
5 wasn't the 1st of January, I know. So it had to	5 I -- that didn't bother me at all.
6 be the 30th or 31st after the -- after the	6 Q. Okay. And you said that that was the
7 incident -- I'm not really sure, but I know it	7 23rd of December?
8 was not in -- January hadn't came yet. Hold on.	8 A. Yes, ma'am.
9 Let me make sure.	9 Q. Okay. And did you work any other days
10 I don't remember. All I know, he	10 between the 22nd and the 30th?
11 called. My husband had the phone. And he told	11 A. I worked again, and one night the -- I
12 me the guy said that he would call me back after	12 want to say two more times because one night the
13 he got back in town or something. And I tried	13 lights went off at work, and she sent me home.
14 calling them and I could never get in touch with	14 But, you know, the likes kept going off and on,
15 ^ with "anyone"? 16:14 him anymore.	15 so that was understandable.
16 Q. Okay. Between December 22nd and	16 Q. And -- okay.
17 December -- what was the last -- let me ask you	17 A. That was understandable. I just
18 this: What was the last day that you worked at	18 didn't understand why people that was there
19 Sonic? Was it the 30th of December?	19 after -- like, why I had to leave, you know, and
20 A. I want to say it was the 30th. I	20 didn't nobody else, you know. She just told --
21 think it was the 30th.	21 she told Barbara to tell me to go home.
22 Q. So I guess between December 22nd and	22 Q. Now --
23 December 30th, did you work at all between that	23 A. She never said anything directly to
24 time period?	24 me. Like, she stopped talking to me, like.
25 A. Yes, I did. I worked -- the 23rd I	25 Q. And you worked the 29th; is that
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1 worked with Tay. I mean -- not Tay. I'm sorry.	1 correct?
2 It was Alesha. And she was telling Barbara how	2 A. Correct. And the 20 -- one night we
3 she tossed and turned that night, and she	3 had -- one day we had something at work. Yeah,
4 couldn't sleep because she was so mad. And	4 it was the 20 -- I think it was the 28th or 29th
5 she said that she waste barbecue sauce all over	5 when those lights went off at work.
6 her. So she was like, Gah, I was just so mad.	6 Q. Now, on the 29th when you worked, you
7 I was just P'd off, she said. She didn't say P,	7 commented in your notes that it was a good
8 but, you know -- yeah.	8 night, that you had a good day.
9 Q. She was telling who that.	9 A. Yes.
10 A. Barbara.	10 Q. And then the 30th when you came in,
11 Q. And did you overhear her say that or	11 you said that you -- that was the day when you
12 did Barbara tell you she said that?	12 got in the altercation with the other employees;
13 A. No, I heard her.	13 isn't that right?
14 Q. And did she tell you why she was mad	14 A. Correct.
15 or tell Barbara why she was mad?	15 Q. Okay. And I guess I'm going to kind
16 A. No. She -- they had already been	16 of take it in a -- a different order, but you --
17 talking. But she came, I guess, so I could	17 I guess at the end of it, you ended up coming
18 hear, you know. But I just ignored her, you	18 into the store and telling the employees that
19 know, and kept working.	19 they didn't know you and didn't know what you
20 Q. So you thought she was talking about	20 would do and threw your purse down; isn't that
21 you?	21 correct?
22 A. I know she was talking about me	22 A. That's not correct.
23 because she said that -- well, she -- her exact	23 Q. You didn't tell them that they didn't
24 words was, She didn't have to tell on him. And	24 know you and --
25 she -- she said I didn't -- she didn't have to	25 A. No.

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1 Q. -- what you would do?		1 so good.
2 A. They was trying to jump on me. I		2 Q. Okay. And then you said earlier that
3 don't know for sure, but I think that Alesha		3 they were saying stuff. Who is "they"?
4 intentionally put me to work for them -- with		4 A. That was Tay and his daughter.
5 them. They was trying to jump on me that night.		5 Q. And what were they saying?
6 His daughter, Alexius Ellis, and Tay was trying		6 A. When I first walked through the
7 to jump on me that night.		7 door -- it didn't bother me -- Tay said, Eric
8 Q. What do you mean by they were trying		8 made this coffee. And she was looking at me. I
9 to jump on you?		9 just went on, washed my hands and --
10 A. They was trying to fight me. His		10 Q. What did she say?
11 daughter had her hands drew back. Tay was		11 A. Eric made this coffee, because usually
12 walking up, you know; and they was cussing at		12 we'll drink coffee at work. And she say, Eric
13 me, calling me all kind of names. That's why I		13 made this coffee. And I just went on to the
14 called the police because I was terrified, you		14 back and didn't say nothing, washed my hands and
15 know. I called the police hoping that it could		15 start working.
16 -- they could deescalate the situation. But		16 And then she was like -- she went
17 they didn't know I called the police. They was		17 outside and talked to Alesha for a minute. And
18 trying to fight me.		18 his daughter came over there and was like, Hey,
19 Q. Okay. So what time did you come to		19 Barbara, how you doing? And she was like, I'm
20 work that day?		20 doing good. I just kept working, kept working.
21 A. I came to work at 5:00.		21 And I was looking there, I noticed there was a
22 Q. At 5:00 o'clock? And when did the		22 whole bunch of dishes in the sink. It wasn't --
23 altercation happen?		23 it never been that many dishes, but I like
24 A. I'm not sure. But ever since I had		24 washing dishes. I didn't mind. So -- because
25 walked through the door, like, they were saying		25 that night it was my night to wash dishes.
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1 stuff; but it didn't bother me, like, I didn't		1 So then when Tay finally did -- after
2 care. You know, I know they was trying to make		2 Tay followed Alesha to her car, they talked for
3 me mad. But, you know, I was there to work. I		3 a minute. And when Tay came back in, she came
4 was there for my children, you know, not for		4 back over there and she was like Hey, Barbara,
5 them. So I just blocked them out.		5 how you doing -- like that right there. She --
6 And after ignoring them for so long,		6 and Barbara was like, I'm doing good.
7 Tay, instead of talking to other people, you		7 She was like, Come here, Barbara. Let
8 know -- well, she would -- she said something		8 me tell you about Bohays [phonetic]. And that's
9 directly to me, you know. And I told her that I		9 my stepdad. Well, my mama used to go with him.
10 had just did five wraps, and it was no way --		10 She got -- my little sister and brother, that's
11 it's no way in that time frame, you, me, nobody,		11 they daddy and she know that me and Tay -- she
12 even -- not even her, could have that ready		12 know that. Me and Tay was -- she know that.
13 within the time frame she wanted.		13 And she was like, He took my phone
14 Q. What was -- you say that Tay was		14 with his old -- she was like, I -- I should have
15 talking to you. She was talking to you about		15 knocked him in the head with his ugly -- you
16 the food preparation?		16 know. And I just ignored her.
17 A. She said -- Tay never yelled at me		17 Q. And who is that?
18 before. And she said, why my chili cheese coney		18 A. My --
19 taking so -- I mean, she was screaming at me,		19 Q. What's his name?
20 like, yelling.		20 A. They call him Bohays.
21 Q. What did she say?		21 Q. Okay.
22 A. Why is my chili cheese coney dog -- my		22 A. But his name is James Eckford.
23 chili cheese coney ain't up here and my fries --		23 Q. And that was who saying that?
24 or either tater tots? And she was screaming,		24 A. Tay.
25 like -- she never did that before. We got along		25 Q. Okay. And she was saying that to

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1	Barbara?	1	after the coney incident, they started yelling
2	A. Yes.	2	at me and stuff. I don't know exactly what they
3	Q. Okay. Okay. But you had said that	3	were saying. They were saying a lot. But I
4	they were -- so that's what they were saying,	4	know I was terrified enough to go and call the
5	the stuff they were saying?	5	police.
6	A. Oh, no. What they were saying to me	6	I asked her could I take a break. She
7	was -- well, they was throwing it towards me:	7	was like, No. I got my purse anyway because I
8	You better stop before you get to her -- because	8	was scared. I was afraid. I got my purse. I
9	the girl was yelling "motz," you know, because I	9	went outside and called the police and asked --
10	would have to get the stuff out the freezer.	10	and I told them I wanted them -- could they
11	And she was screaming at the other girl --	11	deescalate the situation.
12	Haley. That's the other girl I couldn't think	12	Q. So you asked Tay -- you asked Tay if
13	of her name. Her name is Haley. She was	13	you could take a break?
14	screaming loud. And they was laughing because,	14	A. Yes.
15	you know, I had to get the stuff. When she was	15	Q. Were there orders pending and food
16	screaming, I was getting the stuff.	16	that needed to be cooked at that time?
17	Q. What were you -- so she was screaming	17	A. No. Not -- orders was coming but they
18	to get something out of the freezer?	18	wasn't, like, you know, back to back.
19	A. Yeah. She would say "motz." And she	19	Q. How many cooks were in the kitchen at
20	was screaming at the top of her lungs for me --	20	that time?
21	Q. She was saying what?	21	A. It was me and Barbara in the kitchen.
22	A. Motz. They say "motz" for mozzarella.	22	Q. And what time of the day was this?
23	They say "motz."	23	A. I got there at 5:00 o'clock. And I
24	Q. Okay.	24	know when I went to the clock to clock out, it
25	A. Whatever I needed, she was screaming.	25	was 5:55.
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1	I was -- I just kept working, kept working. And	1	Q. So --
2	then Alexius Ellis said you better stop before	2	A. I went -- I didn't clock out because
3	you get charges pressed on you and reported on.	3	they kept walking up on me -- but I'll get to
4	And Tay bust out laughing, and she -- she was	4	that point. After I called the police, I came
5	screaming laughing, like.	5	back in and --
6	Q. Where were you and where were they at	6	Q. So hold on. Let me back up just for a
7	this point?	7	minute. So you asked Tay if you could take a
8	A. They was at the front and I was at the	8	break and she told you no.
9	back fixing the food. But I just kept working,	9	A. Yes, she did.
10	you know.	10	Q. But then you took a break anyway.
11	Q. And you could hear them at the front?	11	A. I did.
12	Were they in the building or out --	12	Q. Okay. And you did not clock out?
13	A. It's small.	13	A. No. I didn't take a break. I just
14	Q. -- out of the --	14	walked outside and made a call. I didn't take a
15	A. No.	15	break. I walked outside and made a call.
16	Q. -- outside?	16	Q. Okay.
17	A. In the front -- the front is like,	17	A. And I was telling the police what
18	okay, the end of this table to maybe where we	18	happened.
19	are now.	19	Q. And was there any other comments or
20	Q. Okay. Any other comments?	20	anything said before that you haven't told me
21	A. When things got heated, I asked her	21	about before you took a break?
22	could I take a break.	22	A. No. Tay -- when I asked her could I
23	Q. And who did you ask if you could take	23	take a break, I went outside, called the police.
24	a break?	24	When I came back inside, Alexius Ellis
25	A. Tay, because they started -- when --	25	say, Why you call me a B? And I said, I didn't

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<p>1 call you no B. And I said -- that's when I said 2 something. I said, Y'all been picking at me all 3 night -- because they was talking at me -- when 4 I asked to take a break, she was like, No, you 5 can't take no -- and she was cussing and, you 6 know, they -- they was. They was coming -- I 7 was scared. I was.</p> <p>8 So instead of them jumping on me, I 9 called the police. And I knew I called the 10 police; they didn't know. So I tried to record 11 them to have proof to show the police. And when 12 Tay seen that I was trying to record them, she 13 was like, Oh, no -- because his daughter say, 14 You could record later. And Tay say, Oh, no, 15 not on my mother -- you know. You're going to 16 have to get your -- on with this -- you know, 17 get out of my clock -- clock out. That's what 18 she told me, to clock out. She said that I 19 couldn't record her but I didn't know that the 20 phone wasn't recording.</p> <p>21 Q. So when Alexius said -- asked you if 22 you called her a bitch, why did she ask you 23 that? Had you talked to her and made comments 24 about her?</p> <p>25 A. No, ma'am. I walked in -- after I got</p>	<p>1 to jump on you?</p> <p>2 A. They was walking towards me and 3 calling me names and stuff, talking about 4 they'll -- I'll die -- got -- she got to write 5 -- I'll F her up, and this and that. When I 6 came back in, his daughter drew back, fixing to 7 hit me, Tay walking up on me and stuff.</p> <p>8 Q. So let me -- I just want to make sure 9 I understand the timeline. So before you went 10 and called the police there -- Tay yelled at you 11 about --</p> <p>12 A. She called me a B.</p> <p>13 Q. -- getting the cheese coney, where's 14 my chili --</p> <p>15 A. Yeah, she --</p> <p>16 Q. -- cheese coney.</p> <p>17 A. Yes.</p> <p>18 Q. And then came in and said something to 19 Barbara along the lines of, how are you doing?</p> <p>20 A. No. She said something how you doing 21 first to Barbara. How you doing, to Barbara 22 and --</p> <p>23 Q. And did you --</p> <p>24 A. And she was like, Girl, let me tell 25 you about Bo -- that's when she said that about</p>
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<p>1 off the phone with the police, by the time I 2 walked in, she said, My question for you is why 3 you call me a bitch? And I was like, I didn't 4 call a -- what are you talking about?</p> <p>5 And I said, Y'all been -- all night 6 y'all been trying to get to me. Like, I didn't 7 tell a story on Eric. He really did that. I 8 was trying to tell them that I wasn't lying on 9 him. But they kept on trying to jump on me. 10 And I was there for my kids. I wasn't there to 11 fight. I wasn't trying to fight.</p> <p>12 Q. Now, when you went outside, I guess 13 the first time, were you yelling on your phone 14 and yelling profanity?</p> <p>15 A. No. No. I didn't, no. I called the 16 police. I told -- I was on the phone with the 17 police. They could verify that I was not 18 cursing. Just go back and listen to the call. 19 After I called the police, I called my husband. 20 My son answered and said he was going to wake 21 him up, you know. So my son -- I said, Tell him 22 that the police is on they -- fixing to come up 23 here, you know, because they're trying to jump 24 on me.</p> <p>25 Q. And why did you think they were trying</p>	<p>1 let me tell you about Bohays. The coney part 2 got after she got to talking, and she -- I guess 3 -- it's like I wasn't -- you know, I kept 4 working. I wasn't saying nothing. Everything 5 they said, calling me Bs, all that, I kept 6 working through it.</p> <p>7 Q. When did they call you -- you said 8 that they called you a bitch?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Who called you a bitch?</p> <p>11 A. Tay and Alexius Ellis both was calling 12 me that.</p> <p>13 Q. So when did they call you a bitch? 14 Was it before you called --</p> <p>15 A. Alexius --</p> <p>16 Q. -- the police or after you called the 17 police?</p> <p>18 A. Oh, before I called the police, it was 19 Alexius Ellis. Tay was sitting up there. She 20 was watching, you know -- no, you can't take no 21 movie. She was cursing and stuff. So --</p> <p>22 Q. Okay. Stop just for a moment --</p> <p>23 A. Okay.</p> <p>24 Q. -- because I just want to make sure I 25 understand the timeline.</p>

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1 A. Okay.	1 while my back was turned.
2 Q. You said before you called the police	2 Q. So your back was turned, and you say
3 Alexius called you a bitch?	3 that someone drew a hand to fight you?
4 A. She was -- they -- she was calling --	4 A. Yes. Alexius Ellis drew back. She
5 she was like, That -- it'll be one less cook if	5 was fixing to hit me.
6 I can help it. That B will be gone.	6 Q. How did -- if your back was turned,
7 Q. And when did she say that?	7 how did you know she was fixing to hit you?
8 A. She said that before I went outside	8 A. No, I was turned to the clock to --
9 and called the police.	9 fixing to clock out, and I was -- I was telling
10 Q. And what was she -- what was she	10 them, I was like, I didn't -- because I didn't
11 referring to or talking about?	11 want to -- I just came -- I was like, I didn't
12 A. Because they asked, How many cooks in	12 lie on him. He really did do that. And so
13 the kitchen. Tay said -- say, How many cooks in	13 that's when she drew her fist up, fixing to hit
14 the kitchen? And she said, It going to be one	14 me.
15 less cook if I can help it. And Tay busted out	15 Q. Did she come into contact with you?
16 laughing. It's like it was planned or	16 A. She didn't hit me, no.
17 something, to me.	17 Q. Now, did you leave the building at
18 Q. Did anyone else say anything directly	18 that point?
19 about you or that you thought was directly about	19 A. When she told -- when they told me to
20 you --	20 leave, I went and sat in my husband -- well, I
21 A. When I --	21 was headed to the car. Tay followed me outside
22 Q. -- before you called the police?	22 and called me a dysfunctional B. And I told
23 A. Before I called the police? Tay had	23 her, It takes a dysfunctional B to know a
24 -- I don't remember -- I really don't remember	24 dysfunctional B. And I -- I was in my husband's
25 exactly, but I know it was badder than how I'm	25 car then.
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1 saying it. It was -- I was terrified enough to	1 Q. When did the police come on the scene?
2 call the police to try to deescalate the	2 A. Like, a few minutes after that. I sat
3 situation. That's all I know.	3 in the car -- I'd say about two minutes after
4 Q. Now, when you stepped outside you	4 that the police pulled up, and they told me that
5 called your husband as well?	5 -- I was sitting in the car; and when I seen
6 A. Yes.	6 them pull up, I got out the car and went and
7 Q. And your husband came up to the Sonic?	7 told them, I was the one that called y'all. And
8 A. He got there before the police got	8 Chaz was the one that came. He already knew.
9 there. He -- when she drew back to hit me, he	9 And he was like even though that happened, by
10 jumped in the middle and, you know, he did like	10 you were on their property and they say leave,
11 this (indicating), you know. Tried to block her	11 you've got to leave. And I was like, I was just
12 lick, like. He was facing me, but he just put	12 waiting for y'all to come. That's all. I was
13 his arms up so she wouldn't hit me because Tay	13 in the car just waiting on y'all to come.
14 was coming on this side and Alexius drew back	14 Q. And so he told you that you needed to
15 fixing to hit me.	15 leave at that point?
16 Q. And where were you when Alexius drew	16 A. He told me by they told me to leave
17 back? Were you inside the restaurant or outside	17 the premises, by Tay and them told me -- by Tay
18 the restaurant?	18 told me to leave the premises, I had to leave.
19 A. All this happened in the inside. I	19 And I told him, No problem. I was going to -- I
20 was going to the clock because Tay told me to	20 was waiting on you-all to come.
21 clock out because I was trying to record. She	21 I was sitting in my husband's car
22 told me not on her watch or whatever, to clock	22 waiting on them to arrive.
23 the F out or whatever. And so I was headed	23 Q. And so when your husband came on the
24 toward the clock to clock out, but they kept	24 scene, did your husband have to restrain you
25 walking on me like they was trying to fight me	25 from physically attacking the other employees?

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1 A. No, ma'am.		1 outside the store within the customers' hearing,
2 Q. So he didn't have to hold you back?		2 would you dispute that?
3 A. No, ma'am. I wasn't -- I do remember		3 A. I would dispute that because I was on
4 that -- I was terrified, but I was not going to		4 the phone with the police. Why would I -- you
5 let them just jump on me. I would defend my --		5 know, I was on the phone with the police. And
6 I was going to defend myself, but I wasn't		6 when I called my son I don't talk -- my husband
7 trying to fight at the same time. I knew the		7 didn't answer. I talked to my son. I don't
8 police was coming. They didn't. I wasn't -- I		8 talk around my son like -- no.
9 wasn't trying to fight. I....		9 After I got off the phone I went back
10 Q. And did you -- did you tell them that		10 inside. I don't -- I -- I don't even remember
11 they did not know you, that they didn't know		11 -- I remember saying how they -- how they act
12 what you could do?		12 toward me, like, talking to the police, but no.
13 A. Huh-uh. I don't recall that.		13 Q. If people reported that you were
14 I'm sure I would remember that. I don't		14 pacing back and forth and yelling profanity,
15 remember that.		15 according to you, you did not do that.
16 Q. Do you remember at any point throwing		16 A. I'm sure I would -- I do not remember
17 your purse down?		17 doing that. I'm sure I would remember doing
18 A. I dropped my purse when she drew back		18 that. I don't remember doing that.
19 fixing to hit me because I had my purse in my		19 Q. And did you press charges against
20 hand. So yeah, I did drop my purse when she		20 anyone that night?
21 drew back fixing to hit me.		21 A. I went to press charges on them, but
22 Q. And did you -- did you lunge towards		22 the dispatch told me by I didn't know their
23 them like you were going to hit them?		23 address, that it was best that I go through
24 A. No. When she drew back at me, my		24 corporate.
25 husband, we don't stay that far from there, just		25 Q. And you said that you called
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1 a few minutes. So my husband came when she drew		1 corporate?
2 back fixing to hit me.		2 A. Yes.
3 Q. And did you -- did you try to fight		3 Q. And what did you -- that was Cynthia
4 them?		4 that you spoke with?
5 A. I -- I would not try to -- no, ma'am.		5 A. It was -- I think that was Cynthia,
6 I wasn't trying to fight them. But I wasn't		6 yeah. It wasn't Anita. Yeah, I think it was
7 going to just let them jump on me either. I was		7 Cynthia. Cindy or Cynthia.
8 going to defend myself, but I didn't start		8 Q. Now, when you spoke with Jordan after
9 nothing. And I wasn't trying to fight, you know		9 the incident on the 22nd, did Jordan not tell
10 -- I was trying to avoid all that.		10 you that she didn't know or didn't see what
11 Q. Now, after -- after Tay asked you to		11 happened?
12 leave and go home, did you leave the store?		12 A. No. She never said that because
13 A. I left the store. I went to the car,		13 that's not true. She saw it. She said she saw
14 my husband's car. She followed me outside,		14 it. That's not true. She never said that.
15 called me a dysfunctional bitch, and --		15 Q. And did you ever tell Jordan that you
16 Q. And so did you leave the store and		16 wanted her to be a witness for you, and she told
17 then come back in?		17 you that she didn't see it, she couldn't tell
18 A. No, I didn't go back in at all. I sat		18 you -- she couldn't testify for you?
19 in my husband's car. And when the police		19 A. That's not true. Ma'am, God know that
20 arrived, I got out the car and went and talked		20 is not true at all. That's not true.
21 to the police. One went inside and one talked		21 Q. So did you ever ask Jordan if she
22 to me outside.		22 would be a witness for you?
23 Q. If customers said that you were		23 A. When I made it to work after the
24 yelling and ranting and raving and using		24 incident, I asked her did she tell her mama. I
25 profanity, like, the F word and the B word and		25 was, like, You need to talk to your mother. And

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<p>1 she said, I don't know -- I don't know how to 2 tell her. And she was also, like, afraid of 3 losing her job.</p> <p>4 Q. Jordan was still in school; isn't that 5 right?</p> <p>6 A. Correct.</p> <p>7 Q. So she was, like, a 16-year-old; isn't 8 that right?</p> <p>9 A. She had just turned 17, I think. I 10 know she's -- yeah, at that time she was, like 11 -- I think she was -- she had just turned 17.</p> <p>12 Q. And did she tell you that she couldn't 13 testify for you?</p> <p>14 A. No, ma'am, she didn't. She never said 15 that.</p> <p>16 Q. But you asked her to testify for you; 17 isn't that right?</p> <p>18 A. I never said "testify." I told her -- 19 the -- the only time we had that conversation is 20 when she wrote down her name to find her on 21 Facebook because she said she didn't have no 22 phone. I told her that I might need her as a 23 witness through the police, you know. That's 24 when she told me, My name is not Jordan on 25 Facebook. It's J Marie. That's when -- that's</p>	<p>1 that I -- it's in the --</p> <p>2 Q. Was it -- was before or after you were 3 terminated from Sonic?</p> <p>4 A. It was after I was terminated because 5 I was trying to give her time to contact her 6 mama -- you know, to tell her mama.</p> <p>7 Q. And how did you contact her mom?</p> <p>8 A. Through Facebook.</p> <p>9 Q. And what did you tell her mom?</p> <p>10 A. That -- I asked her to call me ASAP, 11 and I gave my number. But I never got a 12 response.</p> <p>13 Q. If Jordan told people that you asked 14 her to falsely testify that Eric Ellis came up 15 behind you and humped you in the kitchen, would 16 you have any reason to dispute --</p> <p>17 A. Yes, ma'am.</p> <p>18 Q. -- that she did not view that or see 19 it?</p> <p>20 A. Yes, ma'am, I would dispute that 21 because -- well, all I know she told me she saw 22 it. I never forced her to say anything. I 23 wouldn't do nothing like that, like -- like, at 24 the end of the day, like I said, God don't like 25 ugly. And I would never do somebody like that</p>
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<p>1 how I knew her name.</p> <p>2 But after that, the next -- I only 3 worked with her one time after that, and I asked 4 her -- I waited till wasn't nobody around. I 5 was back there washing my hands because Alesha 6 kept looking, and I didn't really want Alesha to 7 know it was her. But she -- seemed like she was 8 shaky that day or something. I don't know.</p> <p>9 But I told her, I was like, Did you 10 tell your mama? I asked her, I said, Did you 11 tell your mama? And she was like, No, I don't 12 know how to tell her. And I said, You need to, 13 you know, talk to her and just sit her down and 14 tell her, you know. And -- I don't know. But 15 yeah.</p> <p>16 I contacted Jordan mama because I'm 17 like, if she can't talk to her, maybe I could, 18 you know, talk to her for her because the whole 19 time I'm thinking in mind -- you know, I'm 20 keeping in mind that she's a child, and I have 21 girls myself. So I would want somebody to do 22 the same for me, you know, for my girls.</p> <p>23 Q. When did you contact Jordan's mom?</p> <p>24 A. After I tried to contact her, she 25 didn't respond. I don't know the exact date</p>	<p>1 or make something like that up against somebody 2 because I have a brother, I have an uncle. I 3 wouldn't want nobody to do that to them.</p> <p>4 Jordan told me that she saw what he 5 did, and not only that, that he did the same 6 thing to her. I know, she know, and God know. 7 She said that.</p> <p>8 Q. Did you try to contact anyone else and 9 get them to testify for you?</p> <p>10 A. I did try to contact Barbara, and I 11 just told her to call me or something. But she 12 -- I didn't get a response from her.</p> <p>13 Q. And how did you contact Barbara?</p> <p>14 A. I didn't get a response from her.</p> <p>15 Q. How did you try to contact her?</p> <p>16 A. Through Facebook. I'm sorry.</p> <p>17 Q. Did you try to contact anyone else?</p> <p>18 A. I contact the witness, like -- the 19 witnesses in the statement on the recording. 20 The people on the recording, I contacted them.</p> <p>21 Q. Okay. So what recordings did you -- 22 did you make?</p> <p>23 A. I recorded Paris. She told how -- 24 that's how I -- I didn't understand why Tay was 25 that way towards me, and she revealed to me that</p>

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<p>1 Tay and Eric had something going on.</p> <p>2 Q. What did they have going on?</p> <p>3 A. I don't know. She said that they</p> <p>4 would go to the back, and they knew what they</p> <p>5 was doing. I seen them go to the back, but it</p> <p>6 was boxes, you know. They was in the freezer.</p> <p>7 I don't know what they was doing. I'm not going</p> <p>8 to speculate on that. But I just know that's</p> <p>9 what she said.</p> <p>10 Q. What is Paris's last name?</p> <p>11 A. Purnell or something. Purnell.</p> <p>12 Q. And did you know Paris before you</p> <p>13 worked at Sonic?</p> <p>14 A. The first time I worked at Sonic, she</p> <p>15 worked there.</p> <p>16 Q. Did she work there while you worked</p> <p>17 there the second time?</p> <p>18 A. No, not the second time. But she told</p> <p>19 me that she had been going off and on. She had</p> <p>20 been going there, working, like, since the --</p> <p>21 since the time we worked together.</p> <p>22 Q. And why did you record the</p> <p>23 conversation with her?</p> <p>24 A. She didn't know. Nobody knew I was</p> <p>25 recording them. I recorded it to try to have</p>	<p>Page 186</p> <p>1 Q. Have you contacted anyone else to be a</p> <p>2 witness or try to record any statements?</p> <p>3 A. Not that I -- not that I can remember.</p> <p>4 I can't remember.</p> <p>5 Q. Now, the charges that you filed</p> <p>6 against Eric Ellis were dismissed; isn't that</p> <p>7 correct?</p> <p>8 A. I actually called the police to get an</p> <p>9 update of when we go to court. I never went to</p> <p>10 court. I didn't even know he had already been</p> <p>11 to court and the judge threw it out because the</p> <p>12 police wrote on there stalking, and the judge --</p> <p>13 it was the wrong thing. It wasn't supposed to</p> <p>14 be stalking. It was supposed to be</p> <p>15 harassment. They said they wasn't -- they</p> <p>16 couldn't put sexual harassment, so they just put</p> <p>17 harassment, and -- they told me they was going</p> <p>18 to just put harassment. But come to find out</p> <p>19 the police put stalking on the paper, and it was</p> <p>20 threw out.</p> <p>21 Q. So by the time you contacted the</p> <p>22 police, it was after the time that it had been</p> <p>23 dismissed; is that right?</p> <p>24 A. Yes. I found out afterwards. And I</p> <p>25 called the court and -- the lady at the</p>
<p>Page 187</p> <p>1 some proof, you know, to see -- so people would</p> <p>2 know how he is.</p> <p>3 Q. Who else did you record?</p> <p>4 A. Brittany. I don't know her last name.</p> <p>5 I worked with her at Sonic the first time.</p> <p>6 Q. Did Brittany work with you the second</p> <p>7 time?</p> <p>8 A. No.</p> <p>9 Q. And what did Brittany tell you?</p> <p>10 A. She told me that Eric told her that</p> <p>11 Alesha wanted him and Tay wanted him too.</p> <p>12 Q. And did Brittany tell you why Eric</p> <p>13 told her that?</p> <p>14 A. No. She didn't say.</p> <p>15 Q. Okay. Who else did you record?</p> <p>16 A. Tyler. Tyler Blanchard.</p> <p>17 Q. What's Tyler's last name?</p> <p>18 A. Blanchard.</p> <p>19 Q. And why did you record Tyler?</p> <p>20 A. Because my brother came and told me</p> <p>21 that Tyler said he was there and he seen them do</p> <p>22 me wrong or whatever.</p> <p>23 Q. Was Tyler an employee at Sonic?</p> <p>24 A. No. I didn't even know he was sitting</p> <p>25 in his car. He was a customer.</p>	<p>Page 189</p> <p>1 courthouse and found out that the judge threw it</p> <p>2 out, and not only that, that the judge that</p> <p>3 threw it out was no longer there or something.</p> <p>4 Q. Pardon?</p> <p>5 A. The judge who threw it out was no</p> <p>6 longer there, because I was trying to explain</p> <p>7 how I never got a court date or anything. They</p> <p>8 just threw it out because -- something about the</p> <p>9 police put stalking, and it was supposed to be</p> <p>10 harassment.</p> <p>11 Q. And if the court records indicate that</p> <p>12 it was dismissed on February 19th of 2020 --</p> <p>13 A. Uh-huh.</p> <p>14 Q. -- then you would have contacted them</p> <p>15 sometime after that date?</p> <p>16 A. I contacted the police before that</p> <p>17 date, and it was Officer Ealy, and he told me</p> <p>18 that I would -- someone would get in touch with</p> <p>19 me. And then I found out -- after February, I</p> <p>20 found out that they had threw it out. And I'm</p> <p>21 like, I never even got a court date.</p> <p>22 Q. Did you try to refile charges against</p> <p>23 him?</p> <p>24 A. I didn't know I could.</p> <p>25 Q. Did you ask to?</p>

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1 A. No, ma'am, I didn't, because I didn't 2 know I could. 3 Q. Why did you wait until March to file 4 your charge of discrimination? 5 A. No, I had filed it with the EEOC. I 6 had already filed it with the EEOC, like, on the 7 23rd. They didn't contact me -- they didn't 8 start just getting to my case until, like, 9 March. I had been filed it. 10 MS. TAYLOR: Let's go ahead and mark 11 this one as the next one.	1 December 22nd; isn't that right? 2 A. That's correct. I didn't mention 3 that. It was, like, that night, that was way 4 too far, like.... 5 Q. You don't -- you didn't mention in 6 your charge of discrimination that he touched 7 your hand; isn't that correct? 8 A. Correct. I didn't mention that. 9 That's correct. I didn't mention that. But it 10 did happen. He did do it. It's just that night 11 he went too far. 12 Q. We'll go ahead and mark this as the 13 next exhibit. It's the Complaint that you 14 filed. This will be Exhibit 13.
12 13 - - - - 14 (Exhibit Number 12 marked.)	15 16 - - - - 17 (Exhibit Number 13 marked.)
15 BY MS. TAYLOR: 16 Q. So is this the charge of 17 discrimination that you filed? 18 A. Yes. 19 Q. At the time that you filed your charge 20 of discrimination, had you already talked to an 21 attorney about your case? 22 A. Charge of discrimination. I can't 23 remember. I really can't remember. 24 Q. Did you review your charge of 25 discrimination before you signed it?	18 BY MS. TAYLOR: 19 Q. Actually, this is the First Amended 20 Complaint. The initial Complaint was filed on 21 November the 10th of 2020, and then this Amended 22 Complaint was filed on December 28th of 2020. 23 Now, did you review the Complaint 24 before it was filed? 25 A. I think I did. I....
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1 A. Yes, I called myself reviewing it. 2 Q. And you marked in here that the 3 earliest date that discrimination took place was 4 on the 22nd of December; isn't that right? 5 A. Yes. Discrimination as in they -- the 6 options they had on my discrimination fell under 7 the sexual harassment or something, how it went. 8 Q. Okay. So you meant the earliest date 9 the sexual harassment began was December 22nd; 10 is that right? 11 A. Correct. 12 Q. And the latest was the 30th of 13 December? 14 A. Yes. When the discrimination took 15 place. 16 Q. And you indicate in your charge that 17 you were sexually harassed and terminated on 18 December 30th; isn't that right? 19 A. Correct. 20 Q. And then as far as the details of your 21 harassment, you talk about the incident with 22 Eric Ellis on December 22nd; isn't that correct? 23 A. Uh-huh. Yes. 24 Q. And you never talked about Eric Ellis 25 saying anything inappropriate to you before	1 Q. Do you remember reviewing the 2 Complaint before it was filed? 3 A. Yes. I think I -- I called myself 4 reviewing everything. I may have skipped 5 something, I don't know, but I did review it. 6 Q. And in the Complaint you didn't -- you 7 didn't mention that Mr. Ellis had allegedly said 8 anything inappropriate to you before 9 December 22nd; isn't that correct? 10 A. I told -- 11 MR. STUTZMAN: Object to the form. 12 You can answer. You can answer. 13 A. In the complaint I told the lady on 14 the phone -- when I spoke to the lady from EEOC 15 on the phone I told her about -- it was -- I 16 mainly told her about that night, what occurred 17 that night, because all the other stuff, I felt 18 like I could ignore that. But what he did that 19 night was too far. It was -- it's traumatic, 20 like.... 21 Q. But you agree that you didn't include 22 that in your Complaint that you filed in federal 23 court; isn't that right? 24 A. Correct. 25 Q. And in your Complaint you alleged

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<p>1 sexual harassment, retaliation, and then I guess 2 vicarious liability, claiming assault?</p> <p>3 A. Yes.</p> <p>4 Q. And what do you base your allegations 5 of assault on?</p> <p>6 MR. STUTZMAN: Object to the form. 7 You can answer if you understand it.</p> <p>8 A. Could you rephrase it?</p> <p>9 BY MS. TAYLOR:</p> <p>10 Q. What are you claiming as the factual 11 basis for your assault allegation?</p> <p>12 A. What he did to me. Assault for the 13 girls. They tried to fight me. Like, 14 regardless of what they -- they really tried to 15 fight me that night.</p> <p>16 Q. So you allege that both what you claim 17 Eric Ellis did on the 22nd and you claim that 18 employees trying to fight you on the 30th as 19 your basis for assault?</p> <p>20 A. That's -- could you rephrase what 21 you're asking?</p> <p>22 Q. I just want to understand -- you're 23 alleging that what Eric Ellis did on the 22nd 24 related to the trash can incident was assault?</p> <p>25 A. Yes.</p>	<p>Page 194</p> <p>1 the question previously, so I think we're 2 okay.</p> <p>3 MR. STUTZMAN: Okay.</p> <p>4 BY MS. TAYLOR:</p> <p>5 Q. Now, we talked earlier about Sonic's 6 policies and what is prohibited by Sonic's 7 policy. You would agree that Sonic's policy 8 prohibits sexual harassment; isn't that correct?</p> <p>9 A. Correct.</p> <p>10 Q. And it also prohibits threatening or 11 violent conduct; isn't that correct?</p> <p>12 A. Yes. Correct.</p> <p>13 Q. And so the actions undertaken or 14 allegedly undertaken by the girls on the 30th 15 would be a violation of Sonic's policy; isn't 16 that correct?</p> <p>17 A. Correct.</p> <p>18 Q. And then also the alleged actions that 19 Eric Ellis -- you claim that Eric Ellis took on 20 the 22nd of December would also be a violation 21 of Sonic's policy; isn't that correct?</p> <p>22 A. Correct.</p> <p>23 Q. Now, you allege that you have suffered 24 emotional distress, loss of sleep, depression, 25 weight and hair loss related to this claim. If</p>	<p>Page 195</p> <p>1 Q. And you're also alleging --</p> <p>2 A. That was harassment. That was sexual 3 assault to me. And what they did was, like, 4 assault because even though they didn't hit me, 5 if my husband hadn't have stepped in, ain't no 6 telling what they would have did to me.</p> <p>7 MR. STUTZMAN: I'm going to object to 8 this line of questioning, just to the 9 extent that you're -- she has to offer a 10 legal opinion. And she can testify as to 11 what -- and I think she has testified on 12 enough instances that would qualify for 13 assault under the law; but to the extent 14 that your question is asking for her to 15 offer a legal definition of assault and to 16 describe with particularity that, I'm going 17 to object to that.</p> <p>18 MS. TAYLOR: Okay. So just to clarify 19 for the record, I was asking what the 20 factual basis is for the allegation of 21 assault.</p> <p>22 MR. STUTZMAN: And to the extent you 23 understand, you know, the legal definition 24 of assault. You can plug in those facts.</p> <p>25 MS. TAYLOR: I think she's answered</p>	<p>Page 196</p> <p>1 you could, just tell me what the basis of that 2 is. Have you -- have you had hair loss?</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. And have you sought any medical 5 treatment related to your hair loss?</p> <p>6 A. I can't afford medical treatment. I 7 -- I know that as long -- me being stressed out, 8 like, it probably will continue; but it has 9 gotten better. But I still have flashbacks and 10 stuff. I still have times when I can't sleep at 11 night.</p> <p>12 Q. You still have where you can't sleep?</p> <p>13 A. When I can't sleep.</p> <p>14 Q. Have you ever had trouble sleeping 15 before?</p> <p>16 A. No, ma'am, not at all.</p> <p>17 Q. And you also claim that you have 18 depression. What do you base that on? Have you 19 ever sought treatment or medical treatment for 20 either sleeplessness or depression?</p> <p>21 A. No. I couldn't afford it. I didn't. 22 I was -- I really didn't even want to -- I will 23 go stay in the house. I wouldn't go nowhere. I 24 felt like -- I felt like I was worthless, like 25 didn't nobody even care. And for a while I</p>
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1 didn't even want my husband to touch me. When	1 A. I can't remember. I don't know. I --
2 he touched me I got pregnant.	2 I can't remember. I really can't remember.
3 Q. Could you repeat that?	3 Q. Well, let's do this, because I have to
4 A. For a while I didn't want my husband	4 use the restroom, and this is the only
5 touching me. When he did touch me, I got	5 opportunity that I have to speak with you today.
6 pregnant with my son.	6 So let's take a quick break so you can kind of
7 Q. Has it impacted you in any other way?	7 think about that and see if there's anything
8 A. Well, I did gain my weight back.	8 else that you need to tell me, and then we can
9 After I had my baby, I gained my weight back.	9 continue.
10 Before -- like, at the store, I hate for a man	10 A. Okay.
11 to stand behind me too close at the store in a	11 (Brief recess.)
12 line or something. I don't like for men to	12 BY MS. TAYLOR:
13 stand behind me. I dropped some keys and there	13 Q. Ms. Haughton, you've had an
14 were some guys outside, and I did not want to	14 opportunity to think about it?
15 bend over to pick up my keys up. That was like,	15 A. Yes. I can't -- I cannot think of
16 toward the beginning, though.	16 anything.
17 It getting better with time, but I	17 Q. Okay. And you have gone to a doctor
18 still have the flashbacks of it, like it's a	18 since you left Sonic; isn't that correct?
19 traumatic experience I wouldn't wish on nobody.	19 A. Correct.
20 Q. Do you have any other continuing	20 Q. And during your doctors' appointments,
21 problems related to your employment at Sonic?	21 you didn't complain about depression or hair
22 A. That's pretty much it. Me staying in	22 loss or weight loss or sleeplessness; isn't that
23 the house, like, I really -- I don't like to go	23 right?
24 -- I'll go places; but at first it was very bad,	24 A. Well, they knew about my weight, you
25 like, I'll just stay in the house.	25 know, because I wasn't really gaining weight and
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1 Christmas, I didn't even really spend	1 they told me not to worry about it because the
2 time with my family. Like, in the house I spent	2 baby was still gaining weight. But I told them
3 time with my kids. And I would go in the	3 I had trouble sleeping. They said -- but I
4 bathroom and cry because I didn't want them to	4 never mentioned anything about the case because
5 see me crying.	5 I didn't talk about it, you know. I didn't tell
6 MR. STUTZMAN: Do you need a break?	6 people about it.
7 THE WITNESS: I'm okay. I'm okay. My	7 Q. So in your medical records in July of
8 head hurting. I just want to get it over	8 2020, which would have been six months after --
9 with.	9 A. Uh-huh.
10 BY MS. TAYLOR:	10 Q. -- this incident in December of 2019,
11 Q. Is there anything --	11 you didn't complain about any depression or hair
12 A. I wouldn't eat. I couldn't eat.	12 loss or sleeplessness or weight loss; isn't that
13 Q. And how long were you not able to eat?	13 right?
14 A. To this day sometimes I'm still like	14 A. Well, the weight loss -- I didn't tell
15 that, to this very day.	15 them what was going on, no. And I was like, I'm
16 Q. And how much do you weigh?	16 not gaining any weight, like I -- I can't eat,
17 A. Around 230.	17 you know. And they was like, Well, the baby --
18 Q. How much did you weigh before -- or	18 I'm like, I eat but not like I should. You
19 while you worked at Sonic?	19 know, when I was pregnant, I was eating, but not
20 A. I weighed around 2 -- I weighed around	20 like I should. I got my appetite back a little,
21 248.	21 but it wasn't where it should have been, like it
22 Q. Is there anything that happened to you	22 used to be.
23 while you worked at Sonic that you're	23 And no, I didn't -- I didn't say
24 complaining about that we have not talked about	24 anything about why, you know. I just told them
25 today?	25 that I had trouble sleeping. And they was --

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<p>1 the doctor said, Once the baby come you'll sleep 2 better. And I just didn't say nothing. So 3 that's correct. I didn't say nothing.</p> <p>4 Q. And you were asking if you were having 5 any trouble with depression, and you denied 6 depression; isn't that right?</p> <p>7 A. If I had trouble before?</p> <p>8 Q. You were asked at the time of your 9 visit in July of 2020 whether you had any 10 trouble with depression, and you denied that; 11 isn't that right?</p> <p>12 A. That's correct. That's embarrassing. 13 Like, I told them that I didn't. Like, I -- 14 when I was -- I couldn't tell them about the 15 case. You get what I'm saying? I couldn't tell 16 them what was going on, why. So no, I didn't 17 tell them.</p> <p>18 Q. And why couldn't you tell them about 19 your case?</p> <p>20 A. I just didn't talk about it. I didn't 21 -- I didn't talk about it. I didn't tell them. 22 You're right, I didn't tell them. Maybe I 23 should have, but I didn't.</p> <p>24 Q. And your testimony under oath is that 25 you had sleeplessness, depression, and hair loss</p>	<p>1 Patricia is right here.</p> <p>2 Q. I think you're on page 132. If you 3 could go to 133.</p> <p>4 A. Oh, I'm sorry. Patricia -- then 5 Patricia said, We must follow through with our 6 plan and smile, said Lola. Lola walk in the 7 hall and got the broom and stuck the cell phone 8 under her shirt. She walked back into the room, 9 fully running like she had a gun. Patricia went 10 and got some Vaseline and gloves. Oh, no, this 11 some bull -- can I say the word?</p> <p>12 Q. (Nods head up and down.)</p> <p>13 A. -- bullshit, yelled Vernon. Patricia 14 put the gloves on her hand and put Vaseline on 15 top of her fingers on one of her hands. She 16 told Vernon, If you move, Lola will shoot you. 17 You determine if you live or -- or die.</p> <p>18 But that's only entertainment 19 purposes. That was before I got --</p> <p>20 Q. Is that -- oh, if you could continue 21 on page 134, and then -- and then you can 22 provide --</p> <p>23 A. I'm sorry.</p> <p>24 Q. -- some context.</p> <p>25 A. Vernon was frowned up with his lips</p>
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<p>1 and weight loss due to a three-second incident 2 where your manager allegedly came up and humped 3 you from behind; is that correct?</p> <p>4 A. But you have to understand that my 5 husband the only man I know. You know, that's 6 the only man I know. So for another man to 7 violate you like that....</p> <p>8 Q. This is your book; isn't that right?</p> <p>9 A. Correct. Yes, it is.</p> <p>10 Q. Let's go ahead -- and I have a copy of 11 your book. Let's go ahead and put that as an 12 exhibit.</p> <p>13</p> <p>14 - - - -</p> <p>15 (Exhibit Number 14 marked.)</p> <p>16 BY MS. TAYLOR:</p> <p>17 Q. Could you go to page 133 of your book?</p> <p>18 A. 133.</p> <p>19 Q. 133?</p> <p>20 A. Okay. Yes.</p> <p>21 Q. And could you begin reading on the 22 first paragraph of page 133?</p> <p>23 A. Hello. Lola answered, Who is this, 24 and where is Patricia? Rose, is this you? 25 Baby, I love you and miss you. I'm so sorry.</p>	<p>1 poked out. Vernon was already on his knees in 2 handcuffs, so Patricia told him to bend over. 3 He said, It's hard. Lola made the click sound 4 with her mouth. Vernon said, Oh, God, please 5 don't, and he started crying. Snot started 6 flowing out his nose. He looked a mess.</p> <p>7 Continue on some more?</p> <p>8 Q. Yes, please.</p> <p>9 A. Vernon leaned forward, and Patricia 10 rubbed lots of Vaseline on his butthole. Then 11 she stepped to the side. Lola shoved the broom 12 so far up Vernon's ass he said, It hurt. Stop. 13 It -- don't kill me. Please stop.</p> <p>14 Lola said, I don't give a damn. You 15 hurt my daughter, and I'm going to hurt your 16 ass.</p> <p>17 Patricia started laughing, saying, Get 18 it -- your ass. Vernon said, Please stop.</p> <p>19 Lola said, You had me bent out of my 20 mind, and now I got you bent on your ass.</p> <p>21 Continue on some more?</p> <p>22 Q. No. That's -- and so your sworn 23 deposition testimony is -- is that you were so 24 traumatized by Eric Ellis, quote, humping you 25 from behind for three seconds at work that</p>

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1 you've been depressed, sleepless, lost weight	1 call or text my husband so he'll be --
2 and lost hair?	2 MR. STUTZMAN: Yeah, you're finished.
3 A. That's my sworn testimony because I	3 THE WITNESS: Okay.
4 really was -- and those around me know, because	4 MS. TAYLOR: You're fine. You're
5 this book was just entertainment. You know,	5 released as far as I'm concerned.
6 after I wrote the first book, they loved it.	6 (Deposition concluded at 3:12 p.m.)
7 They wanted more. They want -- I actually have	7
8 people that love my writing. And I -- yes, I	8
9 wrote this book, but I left it alone. I don't	9
10 deal with this anymore. I haven't -- I don't	10
11 even deal with this.	11
12 Q. Now, you would agree that at Sonic, if	12
13 an employee uses profanity and yells and	13
14 screaming -- screams in front of customers, that	14
15 Sonic would be able to terminate the employee	15
16 for engaging in disrespectful and rude and	16
17 obscene conduct in front of customers; isn't	17
18 that right?	18
19 A. She cursed at me. All the curses they	19
20 did, I -- she called me a dysfunctional bitch,	20
21 and I called her -- I told her it takes one to	21
22 know one. It takes a dysfunctional bitch to	22
23 know a dysfunctional bitch. But they had been	23
24 doing all that, calling me -- that's the only	24
25 time, like, I said something to her.	25
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1 I was outside. You know, I was at the	1 C E R T I F I C A T E
2 car. She followed me outside. She was outside	2 STATE OF MISSISSIPPI)
3 too. Why not terminate both of us? Why not --	3 COUNTY OF MONROE)
4 why just me?	4 DEPOSITION OF SHEARSON GABRIELLE HAUGHTON SIMS
5 Q. So, Ms. Haughton, but you would agree	5 I, Gena Mattison Glenn, CSR 1568, a
6 that Sonic could terminate an employee who yells	6 Notary Public within and for the aforesaid
7 profanity in front of customers; isn't that	7 county and state, duly commissioned and acting,
8 correct?	8 hereby certify that the foregoing proceedings
9 A. Correct.	9 were taken before me at the time and place set
10 Q. And it would be a violation of that	10 forth above; that the statements were written by
11 policy; isn't that right?	11 me in machine shorthand; that the statements
12 A. That's correct.	12 were thereafter transcribed by me, or under my
13 MS. TAYLOR: Okay. Those are all the	13 direct supervision, by means of computer-aided
14 questions I have.	14 transcription, constituting a true and correct
15 MR. STUTZMAN: I don't have any.	15 transcription of the proceedings; and that the
16 MS. TAYLOR: Thank you, Ms. Haughton.	16 witness was by me duly sworn to testify to the
17 THE WITNESS: Oh, you're welcome.	17 truth and nothing but the truth in this cause.
18 COURT REPORTER: Do you want her to	18 I further certify that I am not a
19 read and sign?	19 relative or employee of any of the parties, or
20 MR. STUTZMAN: Yes, please.	20 of counsel, nor am I financially or otherwise
21 COURT REPORTER: Do you need a copy?	21 interested in the outcome of this action.
22 MR. STUTZMAN: Yeah. You can send it	22 Witness my hand and seal on this 26th day
23 to Craig or myself either one. That's	23 of November, 2021.
24 fine.	24
25 THE WITNESS: Can I go ahead on and	My Commission Expires: CSR 1568
	July 19, 2023 Notary Public

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